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Memorandum



To

SAC PHOENIX 58C-PX-41605

Date 1/19/90

From:

SA

Subject:

ALLEGATIONS AGAINST US SENATORS

ALAN CRANSTON, ET AL;

CPO; 00: PX

The purpose of this memorandum will be to provide an organizational guide for the administration of this matter.

> Sub A 1A's

Sub B Newspaper articles

Sub C FD-302's

Sub D Teletypes

Incoming Airtels Sub E

Sub F Outgoing Airtels

This serial should be maintained as the top serial of the main file and sub files A through F.

(1-58C-PX-41605 SUB A) (1-58C-PX-41605 SUB B) (1-58C-PX-41605 SUB C) (1-58C-PX-41605 SUB D)

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Memorandum



To: SAC, PX 58C-PX 41605 P Date 11/20/89	
From : SAA	ь6 ь7с
Subject: U.S. SENATOR ALAN CHANSTON et AL Bribery: Corruption of Federal OFFICIALS-LEGISLATIVE (00:PX/LA)	
on 11/20/89 a copy of the statements	
of the witnesses that testified before the U.S. House of Representitives Alarings on Lincoln Savings, Wash, D.C. were overnight-expressed	
Davingo, Wash, D.C. were overnight-expressed	
to FBI, Santa, Dona, Calif to the attention	(\mathcal{E})
of SA along with a copy of	
the Opening statement on Oct 26, 1989 of	
Congressman Denry Gonzales, Read of the	
Donse Banking committe. a copy of the	
vitness list is attached 58C-PX-41605-4 SERIALIZED INTILEFILED	
NOV 2 0 1989	

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Witness List

10:00 a.m. Thursday October 26 2128 RHOB William Crawford, Commissioner, California State Department Savings and Loans

William Davis, Deputy Commissioner, California State Department of Savings and Loans

Mike Patriarca, Acting Principal Supervisory Agent, San Francisco Region, Office of Thrift Supervision.

William Black, Acting District Counsel, San Francisco Region, Office of Thrift Supervision

H. Joe Selby, Former Director of Regulatory Affairs, Federal Home Loan Bank of Dallas.

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Committee

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FOR THE INFORMATION OF SAN FRANCISCO, PHOENIX AGENTS
AND LOS ANGELES AGENTS
WILL BE IN SAN FRANCISCO, NOVEMBER 27-30,
1989, TO CONDUCT INTERVIEWS OF EMPLOYEES OF THE OFFICE OF THRIFT
SUPERVISION (OTS). AGENTS WILL BE STAYING AT THE MARK HOPKINS
HOTEL. NO ASSISTANCE IS REQUESTED OF SAN FRANCISCO FBI AT THIS
TIME. SAC'S LOS ANGELES, SAN FRANCISCO AND PHOENIX CONCUR IN
AGENTS' TRAVEL TO INTERVIEW OTS EMPLOYEES. THE UACB AGENTS WILL
TRAVEL AS DESCRIBED.
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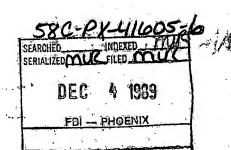
SUPJECT: ALLPCATIONS ACAINST UNITED STATES SENATORS, ALLEN CRANSTON; DEVNIS W. DECONCINI; JOHN GLENN; ET AL; OO:LOS ANCELES/PHOEFIX.

PREFERENCE TELCALL FROM SPECIAL AGENT TO PROENTY DIVISION, DATED NOVEMBER 30, 1989.

APMINISTRATIVE:

FOR INFORMATION OF PHOENIX DIVISION, THE ATLANTA DIVISION, THOMASVILLE RESIDENT ACENCY, HAS RECEIVED INFORMATION REGARDING THE ABOVE-CAPTIONED GASE. THIS INFORMATION HAS BEEN OBTAINED CONFIDENTIALITY. IT IS REQUESTED THAT THE CASE AGENT





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	BE CONTACTED PRIOR	TO ANY	ACTION	INVOLVIN
S INFORMATION.				
on november 13, 1	989, A CONFIDENTIAL	SOURCE	OF TPE	ATLANTA
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TRANSMIT CLASSIFIC	VIA:
FROM:	Director, FBI
то:	SACs, Phoenix (58C-PX-41605) Los Angeles
	ALLEGATIONS CONCERNING U.S. SENATORS ALAN CRANSTON, DENNIS DECONCINI, JOHN GLENN, JOHN MCCAIN, DONALD RIEGLE; CHARLES H. KEATING, DBA LINCOLN SAVINGS AND LOAN (S&L) ASSOCIATION OF CALIFORNIA AND AMERICAN CONTINENTAL CORPORATION; PHOENIX, ARIZONA; CORRUPTION OF FEDERAL PUBLIC OFFICIALS - LEGISLATIVE; OO: PHOENIX OO: LOS ANGELES

ReButelcal of SSA to SSA Phoenix Division on 11/29/89.

Enclosed for Phoenix are copies of the testimony and exhibits of individuals appearing before the Committee on Banking, Finance and Affairs, U.S. House of Representatives, and a copy of the Congressional Record - Senate relating to the response of Senator Cranston to Common Cause from the Senate Ethics Committee.

For information of receiving offices, on 11/30/89, representatives of the White-Collar Crimes Section and Congressional Affairs Office met with Robert S. Bennett, of the law firm Dunnell, Duvall, Bennett and Porter. Bennett, the brother of William Bennett, Director of National Drug Control Policy, has been appointed by the Senate Select Committee on Ethics to investigate their actions of the captioned senators in the intervention on behalf of Lincoln S&L Association with the Federal Home Loan Bank Board.

The purpose of this meeting was to open a line of communication in view of the parallel investigative interests in this matter. Discussed were areas of common concerns and an offer of, to the extent permissable by policy and legal considerations, an exchange of information. Issues regarding original evidence and the possibility of granting of immunity were discussed.

Bennett assured that his office would only accept copies of documents from witnesses eliminating the problem of the FBI having to obtain the originals from his office. As it relates to the granting of immunity, Bennett indicated that the FBI would be notified in ample time to allow appropriate investigative action and to prepare for procedures to investigative Agents from the testimony. Bennett advised that public hearings are a possibility, however, this was several months away.

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59C-PX-41605-7 FBI/DOJ

ь6 b7С Airtel to SAC, Phoenix

RE: Allegations Concerning U.S. Senators Alan Cranston, Dennis DeConcini, John Glenn, John McCain, Donald Riegle; Charles H. Keating, DBA Lincoln Savings and Loan (S&L) Association of California and American Continental Corporation; Phoenix, Arizona; Corruption of Federal Public Officials - Legislative; OO: PHOENIX OO: LOS ANGELES

The meeting, which was cordial throughout, concluded with the agreement to keep the lines of communication open and to exchange information, where possible.

FBIHQ is currently in the process of obtaining copies of the television programs, "Nightline" on 11/22/89, and "This Week with David Brinkley," of 11/26/89, relating to captioned matter. Upon receipt, Phoenix and Los Angeles will be provided with copes of same. Phoenix and Los Angeles should remain alert to any information pertaining to interviews both in print or electronic media, of captioned subjects and/or possible witnesses in captioned matter.

TRANSM	IT VIA:	
CLASSIF	TICATION: DATE:11/13/89	_
FROM:	Director, FBI	
ज 0 :	SACs, Phoenix (58C-PX-NEW)	
	CHANGED: ALLEGATIONS CONCERNING U.S. SENATORS ALAN CRANSTON, DENNIS DECONCINI, JOHN GLEN, JOHN MCCAIN, DONALD RIEGLE; CHARLES H. KEATING, DBA LINCOLN SAVINGS AND LOAN (S&L) ASSOCIATION OF CALIFORNIA AND AMERICAN CONTINENTAL CORPORATION, PHOENIX, ARIZONA; CORRUPTION OF FEDERAL PUBLIC OFFICIALS - LEGISLATIVE; OO: PHOENIX; OO: LOS ANGELES Title marked changed to indicate actual character of	
prev:	as "Corruption of Federal Public Officials". Title iously carried character as "Corruption of State and Local ic Officials."	
Divis	Re: Buteletype to receiving offices dated 11/9/89, and Icall of SSA to SSA Phoenix Santa Anna Resident Agency, on 0/89.	
Direct Separathe the t	Enclosed for receiving offices are two copies each of a randum dated 11/7/89, from Edward S. G. Dennis, Jr., stant Attorney General, Department of Justice to the ctor, FBI, re captioned matter. Enclosed for Phoenix, under rate package copy and sent overnight express, are the ncial Disclosure Statements for captioned U. S. Senators, and testimony and exhibits of individuals appearing before the ittee on Banking, Finance and Urban Affairs, U. S. House of	

During re telcall to SSA Phoenix Division was requested to xerox enclosures sent overnight express and make available for Los Angeles Division.

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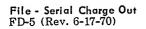
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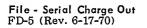


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Memorandum



То	: SAC, PX	394-LA-102009 SUB P	Date	8/18/89
From	: SAA			

Subject: Desect Gem MASINGE 24 (OQ: PX/L1)

ATTACHED IS A copy of A memoraroum dated

July 25, 1985 from American Continential Employee

refecting \$30,000 in total

Controbutions from American Continential employers and

fanilymentures to

Dennis Deconcini (Anizona) Electrin Committee.

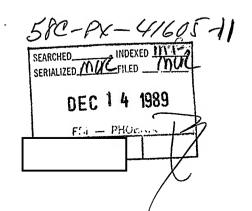
This memorandom was located during an investigative

review of documents in PX case 56C-PX-40548

(NON-FGJ RECORDS).

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Scottsdale, Arizona 60253	•
Dear	
Please find enclosed the follo Deconcini Election Committee for Ca	wing contributions to the Dennis mpaign '88:
Name	Contribution
Charles H Keating, Jr.	\$2000 1000 1000 1000 1000 1000 2000 1000 1000 1000 1000 1000 1000 1000 1000
	Sincerely,
on	

ь6 ь7с CONTRIBUTIONS TO DENNIS DECONCINI '88 CAMPAIGN BY CHARLES H. KEATING, JR. AND RECOGNISED ASSOCIATES

CASE NUMBER: 29A-PX-102009

CASE SUBJECT: CHARLES H. KEATING, JR. et al

NAME	BANK	ACCOUNT NUMBER
KEATING, CHARLES H. JR. KEATING, CHARLES H. JR. SPECIAL	INTERWEST BANK LINCOLN SAVINGS AND LOAN VALLEY NATIONAL BANK FIRST INTERSTATE BANK MERRILL LYNCH-BANK ONE-COLUMBUS, OH VALLEY NATIONAL BANK LINCOLN SAVINGS AND LOAN SCOTTSDALE COMMERCIAL BANK VALLEY NATIONAL BANK WESTERN SAVINGS LINCOLN SAVINGS AND LOAN VALLEY NATIONAL BANK UNITED BANK (NOW CITIBANK) VALLEY NATIONAL BANK	0680-6961 1468-2014

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Memorandum



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Date 12/18/89

From : SAA

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Subject: SEMATORALAN CYMSTON;

etal

Bribary ; Cirruption of Public Officials - Fodoral

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on Dec 14, 1989 Mayor Herb Drinkwater, Scottsdale, Arizona advised writer That the Connection with his 1980 election his campaign received a Burdle of checks from Charles Keating that totaled \$27,000. The checks were not accepted by Mayor Drinkwater NOP were the checks sent over by Keating in Drinkwater's two subsequent Re-elections. The contributions were returned as They greeded Drinkwaters personal Limits on Amounts he will accept for Contributions from one source.

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1-29D-14-102009 SUBC







♥ U.S. GPO:1989-241-706/08023

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Memorandum



To: SACPX 58E41605 P Date 1/16/90
From: $\leq A$
Subject: Allegations against US Senators, Alan Cranston, etal CPO/ OO'. Pt
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Memorandum



To: SAC DX 58C41605 Date P	1/10/90
From : S A	ь6 ь7с
Subject: Allegation's Against Senators Alan Cranston, et al	
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Artists Conception Teletype	Other _	Memo- re meeting on 2/14,
Special handling Instructions: Please deliver Copies t	o	<u>'</u>

TO:

LISTED AGENTS

FROM:

SA

SUBJECT:

POLITICAL CORRUPTION MEETING SCHEDULED FOR 2/14/90, ANAHEIM HILTON SUITES, SANTA ANA, CALIFORNIA

On 2/14/90, a meeting is scheduled for all individuals involved in the Political Corruption cases which have been generated from DESERT GEM; MAJOR CASE 24.

The meeting will be held at the ANAHEIM HILTON SUITES near the Santa Ana Resident Agency. It is suggested all attendees plan on arriving the afternoon or evening of 2/13/90 and schedule a return the afternoon or evening of 2/15/90. The following are all matters which will be discussed:

FILE:

56C-LA-101615

TITLE:

CHARLES KEATING, JR., CHAIRMAN, AMERICAN CONTINENTAL CORPORATION, Phoenix, Arizona; UNSUBS, FRINCIPALS AND OFFICERS OF AMERICAN CONTINENTAL CORPORATION; UNSUBS, PRINCIPALS AND OFFICERS OF LINCOLN SAVINGS AND LOAN ASSOCIATION, Irvine, California; ELECTION LAW VIOLATION; OO: Los Angeles.

FOCUS:

(1.) Conduit contributions to various federal politicians resulting in reimbursement to those conduits from KEATING or his organizations.

(2.) Tax exempt organizations initiated by Senator ALAN CRANSTON, and their associates regarding the theory the organizations are actually partisan organizations which should be covered under the Federal Election Campaign Act.

FILE:

58C-PX-41605

TITLE:

ALLEGATIONS CONCERNING U.S. SENATORS ALAN CRANSTON, DENNIS D. DECONCINI, JOHN GLENN, JOHN MCCAIN, DONALD RIEGLE; CHARLES H. KEATING, JR., dba AMERICAN CONTINENTAL CORPORATION, Phoenix, Arizona, and LINCOLN SAVINGS AND LOAN ASSOCIATION, Irvine, California; CORRUPTION OF FEDERAL PUBLIC OFFICIALS - LEGISLATIVE; OO: PX/LA.

FOCUS:

Allegations that five high ranking U.S. senators listed in the title corruptively attempted to and did in fact influence the FEDERAL HOME IOAN BANK BOARD in return for contributions to tax exempt organizations and to their various campaigns.

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FILE:

194-LA-108012

TITLE:

LAWRENCE W. TAGGART; FORMER COMMISSIONER OF THE CALIFORNIA DEPARTMENT OF SAVINGS AND LOAN; CHARLES H. KEATING, JR.; dba LINCOLN SAVINGS AND LOAN, ITVING, California; CORRUPTION OF STATE AND LOCAL POLITICIANS - STATE LEVEL; OO: Los Angeles.

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FOCUS:

- (1.) Relationship between TAGGART and CHARLES KEATING, JR., as it relates to approvals of direct investments granted by TAGGART and the ultimate investment by LINCOLN SAVINGS AND LOAN and the consulting contract with TCS companies.
- (2.) The possible conspiracy involving TAGGART and former VERNON SAVINGS AND LOAN officer as it relates to the attempted purchase of SHELTER ISLAND SAVINGS AND LOAN.

FILE:

58A-NEW

TITLE:

former member of the FEDERAL HOME LOAN
BANK BOARD, Washington, D.C.; CHARLES H. KEATING, JR.;
dba LINCOLN SAVINGS AND LOAN, Irvine, California;
CORRUPTION OF FEDERAL PUBLIC OFFICIALS - REGULATORY;
OO: Los Angeles.

FOCUS:

The relationship between and CHARLES KEATING, JR., as it relates to appointment on the FEDERAL HOME LOAN BANK BOARD and his attempt to change a regulation which would specifically benefit KEATING and LINCOLN SAVINGS AND LOAN.

The purpose and objectives of this meeting are as

follows:

- 1. prioritize the above matters.
- 2. Prioritize investigation within each individual case.
- 3. Determine needed resources in investigating the above matters.
- 4. Identify, discuss, and assign detailed investigation to be conducted in each of the above matters.

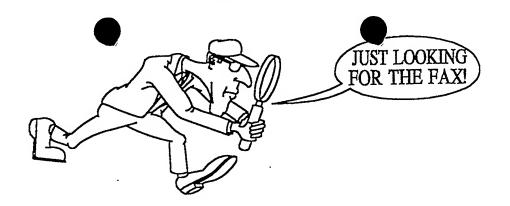
Each attendee is requested prior to the 2/14/90 meeting to personally analyze all aspects of the above matters and to come to the meeting with definite ideas and suggestions concerning strategy, investigative priority of the above cases, investigative priority within each of the above cases, needed resources, and detailed investigation to be completed.

Although each attendee may be primarily concerned with one of the above cases or some particular aspect of each of the cases, it is very important that each attendee does not limit their thinking to that particular area of concern. It is essential the investigation concerning the above matters is a team effort and all ideas, suggestions, and strategies should be voiced and discussed. For example, regarding the file 58C-PX-41605, even though the agents working this matter may be primarily concerned with United States Senators within their state, it is important to analyze and discuss what leads and investigation should be conducted regarding the out-of-state senators. It will be very beneficial if all attendees can discuss and come to an agreement regarding leads to be sent out to other divisions who at this point may not be involved in the investigation.

Attendees

	SSRA, FBI Santa Ana
	SSA, FBI Phoenix
	SA, FBI Santa Ana
	<u> SA, FBI Santa Ana</u>
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	EA, FBI Phoenix
	SA, FBI Phoenix
	AUSA, Los Angeles
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	SA, FBIHQ Washington D.C.

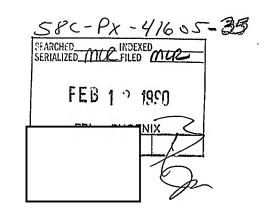
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FD-448 (Rev. 3-7-88)

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FBI/DOJ



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United States Bistrict Court	CENTRAL DISTRICT OF CALIFORNIA
	SUBPOEMA FOR Person XXX Document or Object
YOU ARE HEREBY COMMANDED to appear ate, and time specified below to testify before the C	in the United States District Court at the location, Grand July
152	COURTROOM
United States Courthouse	1346B
312 North Spring Street	DATE AND TIME
Los Angeles, California 90012	March 1, 1990 9:00 a.m.
YOU ARE ALSO COMMANDED to bring with	h you the following document(s) or object(s): ⁶²³
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	Stephen A. Mansfield
This subpost and subsequent application of the United States of America by:	Assistant United States Attorney 1300 United States Courthouse
	312 North Spring Street
ROBERT L. BROSIO United States Attorney	Los Angeles, California 90012 Telephone: (213) 894-3358
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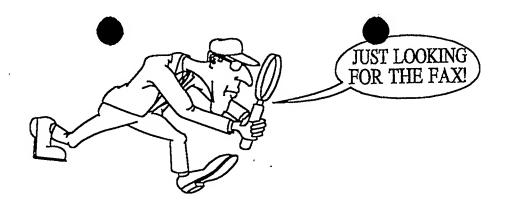
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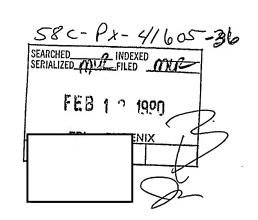
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		Approved: TFA	102		

FBI/DOJ



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PAGE.011 FEB 5 '90 16:02 SUBPOENA TO TESTIFY BEFORE GRAND TRY 0 316 (Rev. 39/42: DISTRICT United States Bistrict Court CENTRAL DISTRICT OF CALIFORNIA SUBPOLNAFOR ☐ Person b6 XIII Document or Object b7C YOU ARE HEREBY COMMANDED to appear in the United States District Court at the location, date, and time specified below to testify before the Grand Jury MOGETRUCS PLACE 1346B United States Courthouse 312 North Spring Street DATE AND TIME Los Angeles, California 90012 March 1, 1990 9:00 a.m. YOU ARE AUSO COMMANDED to bring with you the following document(s) or object(s):[33] SEE ATTACHMENT D Please see additional information on reverse

This subpoens shall semain in effect until you are granted leave to depart by the court or by an officer acting on behalf of the Bouffy.

CLERK

LEONARD A BROSK

January 31, 1990

This subpossessing tracked on application of the United States of America by:

ROBERT L. BROSIO United States Attorney WE ADDRESS AND PHONE HUNBER OF ASSISTANT US, ATTORNEY Stephen A. Mansfield Assistant United States Attorney \$300 United States Courthouse 312 North Spring Street Los Angeles, California 90012 Telephone: (213) 894-3358

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AGENT: S/A

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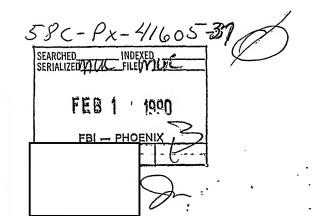
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AGENT: S/A

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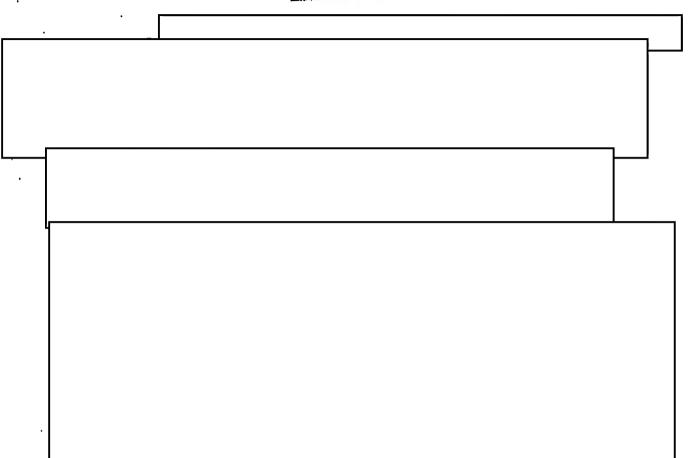
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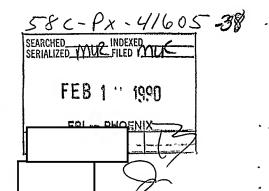
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	SUBPOEMA FOR Person XIII Pocument or Object
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United States Courthouse	1346B
312 North Spring Street Los Angeles, California 90012	March 1, 1990 9:00 a.m.
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This subjournit stand on application of the United State of America by: ROBERT L. BROSIO United States Attorney	Stephen A. Mansfield Assistant United States Afforney 1200 United States Courthouse 312 North Spring Street Los Angeles, California 90012 Telephone: (213) 894-3358

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ENT: S/A

AN AGENT OF THE FBI NOTE:

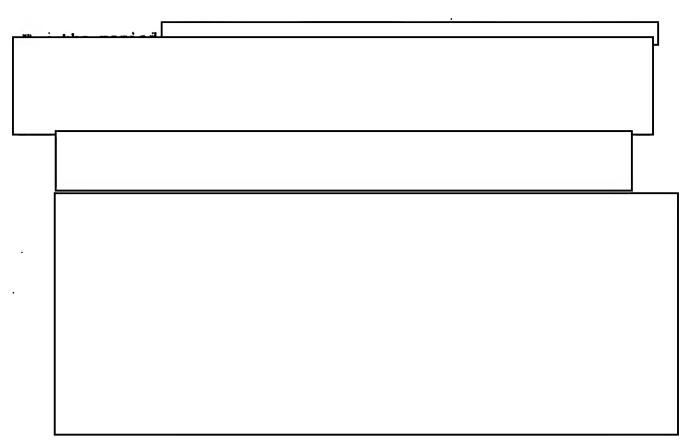
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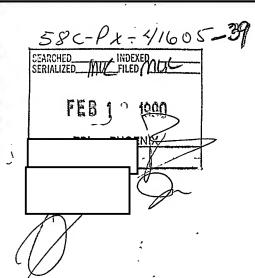
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FBI (714) 542-8825

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United States Bistrict Court	DISTRICT
	CENTRAL DISTRICT OF CALIFORNIA
·	☐ Person XØ Document or Object
YOU ARE HEREBY COMMANDED to appear date, and time specified below to testify before the	in the United States District Court at the location, Grand Jury
LACE	COURTROOM
United States Courthouse 312 North Spring Street	1346B
Los Angeles, California 90012	March 1, 1990 9:00 a.m.
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This subpoens shall remain in effect until you are gra	nted leave to depart by the court or by an officer acting
EONARD A BROSKAN	DATE
D. E. I. A. Ile	January 31, 1990
This subporters traced on application of the United States of America by:	Stephen A. Mansfield Assistant United States Attorney #300 United States Courthouse 312 North Spring Street
ROBERT L. BROSIO United States Attorney	Los Angeles, California 90012 Telephone: (213) 894-3358
	OTE: AN AGENT OF THE FBI WILL DELIVER THE ABOVE-MENTIONED DOCUMENT

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ATTACHMENT

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U.S. Department of Justice



Federal Bureau of Investigation

In Reply, Please Refer to File No.

11000 Wilshire Boulevard Los Angeles, California 90024

February 7, 1990

Assistant Inspector General for Investigations U.S. Department of the Treasury 1201 Constitution N.W. Washington, D.C. 20535
RE:
Dear
This letter confirms a telephone conversation on February 7. 1990, between of your office and SA of our office.
We understand that is in possession of the file for an investigation conducted by the Inspector General of the Federal Home Loan Bank Board (FHLBB). the subject of which was former FHLBB member For criminal investigative purposes, the Federal Bureau of Investigation (FBI) respectfully requests that you make this file available to FBI agents for review and copying.
has agreed to provide, this week, the file for review and copying to SA of the FBI's Phoenix Division.
Thank you for your courtesy.
Sincerely yours,
LAWRENCE G. LAWLER Special Agent in Charge BY: Senior Supervisory Resident Agent

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File - Serial Char FD-5 (Rev. 10-13-	ge Out -89)		Date	
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Director, FBI

SACs, Los Angeles (29D-LA-102009)
(Phoenix (58C-PX-41605))

ALLEGATIONS CONCERNING U.S. SENATORS ALAN CRANSTON, DENNIS D. DECONCINI, JOHN GLENN, JOHN MCCAIN, DONALD RIEGLE; CHARLES H. KEATING, JR., DBA LINCOLN SAVINGS AND LOAN (LSL) ASSOCIATION OF CALIFORNIA AND AMERICAN CONTINENTAL CORPORATION (ACC), PHOENIX, ARIZONA; CORRUPTION OF FEDERAL PUBLIC OFFICIALS - LEGISLATIVE; OO: PHOENIX/LOS ANGELES

Enclosed for the information of Los Angeles and Phoenix are two copies each of a letter from dated 3/9/90.

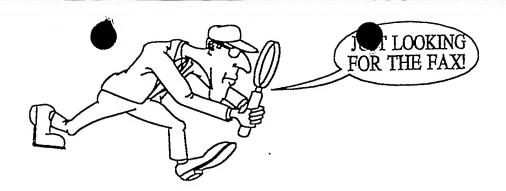
The enclosed letter is being provided for any possible assistance to the Los Angeles and Phoenix Divisions.

Enclosure

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FD-448 (Rev. 3-7-88)

Transmit attached by Facsimile	PRECEDENCE: [Immediate [Priority	CLASSIFICATION: TOP SECRET SECRET	
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FBI/DOJ

Memorandum



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To :	SAC,	PHOENIX	(58C-PX-4160	05)	Date 4/3/9	90
From :						·
Subject:	ALAN CHARI LINCO CALII CORPO CORPO	CRANSTON LES H. KI DLN SAVIN FORNIA AN DRATION,	CONCERNING U. ET AL; EATING, JR., NGS AND LOAN ND AMERICAN O PHOENIX, ARI F PUBLIC OFF	DBA ASSOCIATION CONTINENTAL IZONA;		
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presen		/6/90, ner couns	sel,	<u>i</u> n Wash	erviewed ington, DC.	•
document memo indication la	r DE Conts plus her sted DE ter dured thes are two S KEAT!	ONCINI. us the summarize CONCINI ring the se docume addition ING dated	ation of these told her he interview stants to DE Connal document 4/1/87 and 37 memo preparents	she prepare CONCINI gave letter to su se documents got these diated she dionCINI. The she prepare 2/87.	her 4-8 pammarize. The second of the second	7 memo for ages of The 3/19/87 initially com KEATING who her stated ning
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for the 4/2/87 meeting which included of the Federal Home Loan Bank Board and the other U.S. Senators. said the 2/87 memo was prepared after a meeting occurred in Senator DE CONCINI's office which he (DE CONCINI) did not attend that related to the effort of KEATING to sell LSL. The only U.S. Senator attending this meeting was CRANSTON. Staff members from Senator RIEGLE's Office along with KEATING associates participated in the meeting. said the end result of this meeting was to have Senator DE CONCINI call Federal Home Loan Bank Board regarding the proposed sale of LSL. stated it is her understanding DE CONCINI did, in fact, telephone	b6 b7с
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further stated prior to the 4/2/87 meeting Senators MC CAIN and DE CONCINI met to discuss whether they should, in fact, attend the 4/2/87 meeting with said the senators were concerned that might "misrepresent" the meeting to the press.	
stated had a reputation as a loose canon and this was of concern to the senators. MC CAIN apparently had spoken to other Republicans and they had informed MC CAIN of potential for irrational behavior. stated the only other senate staff member she had a discussion with	b6 b7С
concerning KEATING was in MC CAIN's office.	
On 3/7/00 CEORGE COULD (former Cogretary of the	

On 3/7/90, GEORGE GOULD (former Secretary of the Treasury) said he met CHARLES KEATING on two occasions. The first occasion being a philosophical talk regarding the S&L industry. The second meeting KEATING "threw his weight around" because KEATING was aware GOULD was drafting legislation which would be supportive of _______ position. KEATING told GOULD he had significant influence in the senate and could help or hinder GOULD's effort to have legislation passed. KEATING further informed GOULD that GOULD was not "in line with administration's

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philosophy" on deregulation. GOULD told KEATING his (KEATING's) philosophy was to run a savings and loan association as your mutual fund with the FSLIC bearing the complete and total risk. KEATING responded, in fact, that he did feel this way. KEATING informed GOULD he had attempted to hire away from the Federal Home Loan Bank Board in an effort to "help the country". GOULD, after the second meeting with KEATING, alerted appropriate security at the Department of Treasury not to allow KEATING or his associates back in the Treasury building for meetings with any Treasury personnel. GOULD further stated that upon the conclusion of the 4/2/87 meeting between and the senators, informed him that the senators had attempted to influence him. however, said it was forbidden by law for him to go into detail concerning this meeting and only informed GOULD of the meeting.
Home Loan Bank Board stated he was confirmed when being considered for a member of the bank board. Sald on 12/18/86 the board was considering whether to continue, change, or abolish the direct investment regulation. was completely unfamiliar with this regulation and had requested the current regulation be extended approximately 75 days allowing time to review. According to there had been an understanding between that the regulation would, in fact, be extended, however, on the day the board was to vote this issue, presented an 11-point plan which if adopted would have directly benefited LSL and San Jacinto S&L in Texas barring them to circumvent the direct investment regulation. stated this was completely contrary to the agreement and understanding previously reached among the board members.
said he had met CHARLES KEATING and other KEATING associates and no improper request or favor had been requested of him, however, he was invited by (an attorney for KEATING) to Phoenix to review the KEATING operation.
On 3/13-14/90 and 3/20/90, the following employees of the Office of Thrift Supervision were interviewed:

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The purpose of these interviews was to address statements made by before the Housing	<u>r</u>
Banking Committee in December 1989. These interviews concerned	
the position of the Federal Home Loan Bank Board, Washington, DC	
in 1987 regarding LSL. At that time, the Federal Home Loan Bank Board in Washington, DC agreed with the position taken by the San	ı
Francisco District as well as its recommendations.	
Bank Board, the attitude and position changed to the point where	
the Federal Home Loan Bank Board challenged every aspect of the	
San Francisco's March 1986 examination of LSL. It should be	
noted from 1984-1986, San Francisco supervised the receivership of over 32 S&L's and was never challenged by the Federal Home	
Loan Bank Board.	
During these interviews it was also established that from	n
the inception of the March 1986 examination until its completion	•
in October 1986, there was considerable dialogue, both oral and written, between the 11th District (San Francisco) and the	b6
Federal Home Loan Bank Board including specific conversations	b7C
which were frequent with	
advised	ъ6 ¬ ъ7с
that	
The interviews with employees of the San Francisco	
Federal Home Loan Bank (11th District) determined that examiners	
of the '88 and '89 exam of LSL were concerned their findings	
would not be made part of the official report and therefore kept separate records of the findings. These individuals are	b6
would not be made part of the official report and therefore kept separate records of the findings. These individuals are	b 7с
would not be made part of the official report and therefore kept	b 7с

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instructed to keep a separate set of records concerning his exam findings. Concerns also surfaced from within the California Department of Savings and Loan Association. The federal examiners were not addressing the important issues of the institution in 1988 and their exam appeared to be a white wash.
Mayor HERB DRINKWATER of Scottsdale, Arizona has been interviewed and admitted that he received campaign donations from KEATING, but they were returned. DRINKWATER stated that an associate, actually had the contact with KEATING and would have the details concerning the amount of monies contributed and returned. DRINKWATER did, however, say on one occasion KEATING stated "You're the only one that never took any money." However, when DRINKWATER was pressed as to whose words these were, he indicated he could not recall specifically what KEATING said, however, the statement, "You're the only one that never took any money" are his (DRINKWATER's) and the statement reflects the sentiment of the statement made by KEATING.
The potential defendants in this case are CHARLES H. KEATING, JR., and Senators DE CONCINI, MC CAIN, CRANSTON, RIEGLE, and GLENN. Criminal statutes are violations of:
Title 18, U.S.C. Section, 201 Bribery
" " 371 Conspiracy
" " 2 Aiding and Abetting
" " 1951 Hobbs Act
" " 1505 Obstruction of Proceedings
Before an Agency " " 1341 Mail fraud
" " 1341 Mail Hadu " 1343 Fraud by Wire
1343 Fladd by Wile
The following are examples of KEATING's influence and attempted influence of the Federal Home Loan Bank Board:
a) the attempted appointment of to the bank board to bank board
b) KEATING's second meeting with
c) the "secret" file that described to which was given to him by KEATING
d) one-day firing

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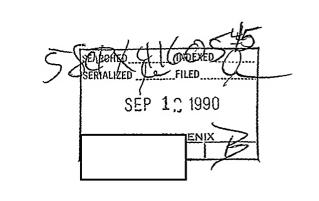
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to the bank board

e) the appointment of

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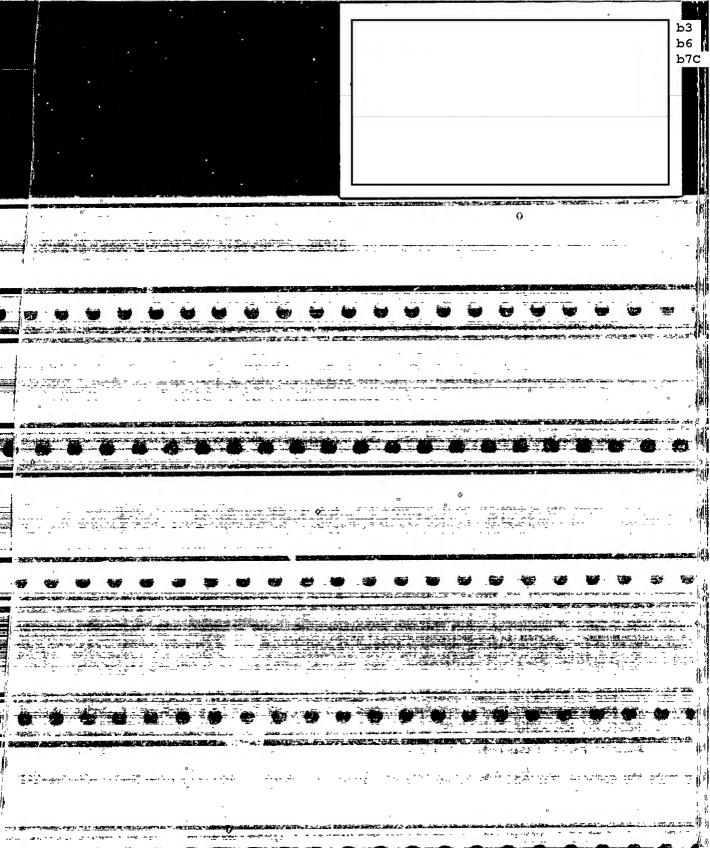
f) the attempted appointment of Professor to the bank board	ь6 ь7С
g) the transfer of supervisory authority from the 11th District to the Federal Home Loan Bank Board	
h) the July 1987 meeting between KEATING associates and	
Additional examples are denial of the Federal Home Loan Bank-San Francisco's request to conduct additional limited scope examination at LSL after he met with LSL representatives in DC without San Francisco's presence or knowledge of this meeting, the Memorandum of Understanding (MOU) proposed by LSL and ultimately accepted by the Federal Home Loan Bank Board, the 1988 and 1989 exam procedures (which are believed to have been limited in scope) denied the benefit of the 1986 exam findings, and KEATING's attempts to have of the California Department of Savings and Loans (CDSL) fired because of their support for the March 1986 exam.	
LEADS:	
Interview of	b6 b7С
Federal Home Loan Bank), (of the Chicago Federal Home Loan Bank). Interview Federal Home Loan Bank Board employees.	D/C
and others and the setting of leads from the CHARLES KEATING agenda for interviews of other political figures who met with KEATING regarding the Federal Home Loan Bank Board.	
Also, the subpoenas that have been requested of AUSA for service on will be obtained and served.	b3 b6 b7C



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Anite States Bistrick Lourt

. CENTRAL DISTE	RICT OF CALIF	
	er toty	NENIA TO TESTIEV
	SUBPOENA TO TESTIFY BEFORE GRAND JURY	
	SUBPOENA FOR:	DOCUMENT(S) OR OBJECT(S)
YOU ARE HEREBY COMMANDED to appear and testi	•	y of the United States District Court at '
Ace, date, and time specified below.		
		COURTROOM
ited States Courthouse		
2 North Spring Street		DATE AND TIME
s Angeles, California 90012	•	September 25, 1990
	• •	9:00 a.m.
YOU ARE ALSO COMMANDED to bring with you the	following document(s)	or object(s):"
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For the regional lanv	and all records	and documents relating
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		SA FBI PX
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This subpoens shall remain in effect until you are half of the court. K CONARD A. BROSNAV DEPUTY CLERK	NAME, ADDRESS AND	DATE September 6, 1990 PHONE NUMBER OF ASSISTANT U.S. ATTORNEY
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Record Request FD-125 (Rev. 5-31-88) Birth Motor Vehicle Credit Criminal Death INS ☐ Marriage* Driver's License Buded Name and al 833-ZZG7 Addresses Residence Business Former *Date and place of marriage (if applicable) Race Sex Age Height Weight Hair Eyes ☐ Male Female Birth date Birthplace Arrest Number Fingerprint classification Criminal specialty Specific information desired Social Security Number Results of check Reg. 10-5-90. Afd Subsailer received 18/8/90 Afd SEARCHED____INDEXED____ SERIALIZED FILED OCT 11 1990

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U S WEST SECURITY OFFICE

AGENCYF.B.I.		$-$ DATE $\frac{10/5/90}{2}$			
ADDRESS	²⁰¹ E. <u>Indianola</u>	CITY Phoenix, Arizona 85012			
AGENTS NAME ISA AGENCY PIN # 1D1273		AGENTS TEL. # 279-5511			
AGENCY	PIN # 1D1273		•		
		Y A PARTICULAR (COURT ORDER INTERCEPTION,		
	IFY COURT ORDER NUMBER:				
PEN REGISTE	R #	TRAP & TRACE #			
	WIRE INTERCEPTION				
In connection	with an official investigation bein	r conducted by thi	s office, we request the following		
subscriber info		g conducted by the	5 omee, we request the following		
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AGREEMENT	
The following understandings exist as to the meeting of	
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to be nega at the office of U.S. Afterneys of the	<u> </u>

October 10, 1990 ("the meeting"):

- (1) Client will respond truthfully and completely to any and all questions or inquiries that may be put to him at the meeting;
- (2) Should any prosecution be brought against Client by the United States Attorney for the Central District of California, the Government will not offer in evidence in its case-in-chief, or in connection with any sentencing proceeding for the purpose of determining an appropriate sentence, any statements made by Client at the meeting, except in a prosecution for false statements, obstruction of justice, or perjury;
- (3) Notwithstanding paragraph (2) above, the Government may use (a) information derived directly or indirectly from the meeting for the purpose of obtaining and pursuing leads to other evidence, which evidence may be used in any prosecution of Client by the Government, and (b) statements made by Client at the meeting and all evidence obtained directly or indirectly from those statements for the purpose of cross-examination should Client testify, or to rebut any evidence offered by or on behalf of Client in connection with the trial and/or at sentencing, should any prosecution of Client be undertaken;
- (4) This Agreement is limited to the statements made by Client at the meeting and does not apply to any statements made by Client at any other time, whether oral, written or recorded;
- (5) No understandings, promises, agreements and/or conditions have been entered into with respect to the meeting other than those expressly set forth in this Agreement and none will be entered into unless in writing and signed by all parties.

Dated: 0, 1990, 1990. at Los Angeles, California.

LOURDES G. BAIRD
United States Attorney for the
Central District of California

By:

Assistant U.S. Attorney

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[TRANSMIT VIA: Teletype					
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3	FBI WMFO/ROUTINE/					
4	INFO FBI PHOENIX/ROUTINE/					
5	BT					
5	UNCLAS					
7	CITE: //3410:0670//					
8	PASS: BUREAU SSA PUBLIC CORRUPTION UNIT.					
9	PADD: DOIMAD DOM					
10	SUBJECT: ALLEGATIONS CONCERNING U.S. SENATORS ALAN CRANSTON,					
11	DENNIS DECONCINI, JOHN GLENN, JOHN MCCAIN, DONALD RIEGLE;					
12	CHARLES H. KEATING, JR., DBA LINCOLN SAVINGS AND LOAN					
13	ASSOCIATION, IRVINE, CALIFORNIA, AND AMERICAN CONTINENTAL					
14	CORPORATION, PHOENIX, ARIZONA; CORRUPTION OF FEDERAL PUBLIC					
15	OFFICIALS - LEGISLATIVE; OO: PHOENIX/LOS ANGELES.					
16	RE SANTA ANA SA TELCALL TO PUBLIC					
17	CORRUPTION UNIT SSA ON 9/7/90, AND SA TELCALL					
18	WITH WMFO SSA ON 9/10/90.					
19	AS DISCUSSED IN REFERENCED TELCALLS, LOS ANGELES SA'S					
20	AND PHOENIX SA					
21						
41	MJAJ/cpt					
	Approved: LGL/GE Transmitted Per					

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PAGE TWO (58C-PX-41605)
INTEND TO TRAVEL TO WMFO 9/16/90 THROUGH 9/21/90 FOR THE
PURPOSE OF CONDUCTING INTERVIEWS IN CAPTIONED MATTER. INTERVIEWS
ARE PLANNED OF THE FOLLOWING:
1. FEDERAL HOME LOAN BANK
BOARD (FHLBB), REGARDING HIS CONTACTS WITH THE SUBJECT SENATORS.
2.
REGARDING DECONCINI'S OFFICE'S CONTACTS WITH THE FHLBB ON BEHALF
OF CHARLES KEATING.
3.
REGARDING HER CONTACTS WITH THE FHLBB AND KEATING.
4. UNITED STATES REPRESENTATIVE CHARLES PASHAYAN, REGARDING
HIS CONTACTS WITH KEATING.
5. UNITED STATES REPRESENTATION DOUG BARNARD, JR., AND
REGARDING THEIR CONTACT'S WITH
KEATING.
6,
REGARDING KEATING'S CONTACTS WITH WILSON'S OFFICE.
7. DONALD REGAN, FORMER WHITE HOUSE CHIEF OF STAFF,
REGARDING SENATOR DECONCINI'S EFFORTS TO OBTAIN
APPOINTMENT TO THE FHLBB IN 1986.
8.
REGARDING DECONCINI'S EFFORTS TO
OBTAIN APPOINTMENT TO THE FHLBB.
9. (NOT YET ARRANGED), FORMER LOBBYIST FOR

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File - Serial Charge Out FD-5 (Rev. 6-17-70)

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6	CITE: //3630// _	[Public Corruption Unit	
7	PASS: FORFBIHOSSA	to, l	shile collar Corner Section.	
8	SUBJECT: ALLEGATION	ONS CONCERNING U.S.	SENATORS ALAN CRANSTON,	İ
9	1	- American	CAIN, DONALD RIEGLE;	1
10			SAVINGS AND LOAN ASSOCIATION	
11	1 **	<u> </u>	NENTAL CORPORATION (ACC),	
12	i		AL PUBLIC OFFICIALS -	
13	LEGISLATIVE; OO: 1			
14	FOR THE INFORM	MATION OF SACRAMENTO	, THIS CASE ARISES FROM A	
15	MEETING OF THE FIVE	U.S. SENATORS WITH	ON APRIL 2,	
16	1987, AND THEN WITH	OFFICIALS FROM THE	FEDERAL HOME LOAN BANK OF	
17				
18	REB: KF			
19				
20		:		
21				
Se Se Inc	ea/	JULIAN DATE:	wu.s. GPO. 1987 —	
•			U8L-11. 71.402 - T	/

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^PAGE TWO PX 58C-PX-41605 UNCLAS SAN FRANCISCO, APRIL 9, 1987. INVESTIGATION HAS SHOWN KEATING WAS A MAJOR CONTRIBUTOR TO THE SENATORS AND DURING THE MEETINGS WITH THE FEDERAL HOME LOAN BANK BOARD (FHLBB) FEDERAL HOME LOAN BANK OF SAN FRANCISCO OFFICIALS, THEY QUESTIONED THESE INDIVIDUALS CONCERNING LINCOLN SAVINGS AND LOAN ASSOCIATION (LSL). AND THE SAN FRANCISCO BANK OFFICIALS HAVE BEEN INTERVIEWED AND ALL CHARACTERIZE THE CONTACTS BY THE U.S. SENATORS AS UNUSUAL AND INAPPROPRIATE. THE DEPARTMENT OF JUSTICE HAS REQUESTED THE FBI TO INVESTIGATE THIS MATTER. INVESTIGATION THUS FAR HAS SHOWN THAT THE SENATORS, FROM REVIEW OF DOCUMENTS AVAILABLE TO THE FBI, MET FREQUENTLY WITH KEATING AND SENATORS DE CONCINI AND CRANSTON AFTER HAVING LEARNED APRIL 9, 1987 THAT A CRIMINAL REFERRAL HAD BEEN MADE REGARDING THE MANAGEMENT AND OPERATION OF LSL, CONTINUED TO CONTACT VARIOUS INDIVIDUALS CONCERNING LSL. THESE CONTACTS NOT ONLY INCLUDE OFFICIALS OF THE FHLBB IN WASHINGTON, D.C., BUT STATE OFFICIALS AS WELL. ON APRIL 12, 1990, ADVISED THAT HE LEARNED THAT SENATOR DENNIS DE CONCINI CONTACTED

TRANSPORTATION AND HOUSING, WHICH OVERSEAS

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^PAGE THREE PX 58C-PX-41605 UNCLAS THE STATE DEPARTMENT OF SAVINGS AND LOAN IN CALIFORNIA. CONTACT WOULD HAVE BEEN IN MARCH TO APRIL OF 1989. AT THIS TIME, WAS ATTEMPTING TO PURCHASE LSL. WAS LATER DETERMINED BY THE FHLBB TO BE A "FRONT MAN" FOR CHARLES KEATING. SAID THAT DE CONCINI TOLD THAT HAD SAID THAT MOULD BE A PROBLEM WITH THE PROPOSED SALE. SENATOR DE CONCINI FURTHER STATED THAT LSL WOULD BE CONVERTED TO A FEDERAL SAVINGS AND LOAN, THEREFORE, CALIFORNIA WOULD HAVE NO JURISDICTION. FURTHER STATED IT WAS HIS UNDERSTANDING THAT DE CONCINI EXPRESSED CONCERN THAT WOULD LEAK THIS PROPOSED SALE TO THE PRESS. HE SPECIFICALLY REQUESTED THAT REQUEST NOT TO COMMENT ON THE SALE. SAID THAT HE RECEIVED THIS INFORMATION FROM HOWEVER, DID NOT EXPRESS OR ISSUE ANY ORDERS TO CONCERNING HIS ACTIVITIES, PUBLIC OR PRIVATE, CONCERNING THIS PROPOSED SALE. ALSO STATED THAT HE RECEIVED A TELEPHONE CALL FROM TRANSPORTATION AND HOUSING AFTER TELEPHONE CALL. ASKED SPECIFICALLY WHY THE SALE WAS

^PAGE FOUR PX 58C-41605 UNCLAS					
NOT GOOD AND THEN DISCUSSED THE PARTICULARS OF THE SALE IN					
DETAIL. DOES NOT KNOW IF ALSO RECEIVED A					
TELEPHONE CALL FROM SENATOR DE CONCINI OR HAD BEEN BRIEFED BY					
BOTH AND HAVE A WORK ADDRESS OF					
SACRAMENTO, CALIFORNIA.					
BUSINESS TELEPHONE NUMBER IS AND					
TELEPHONE NUMBER IS					
FOR THE INFORMATION OF SACRAMENTO, PHOENIX HAS OBTAINED THE					
AGENDA OF CHARLES KEATING AND REVIEW OF THIS DOCUMENT REVEALS					
THAT KEATING MET WITH ON FEBRUARY 9, 1988 REGARDING THE					
LSL EXAMINATION. KEATING ALSO MET WITH ON MAY 3, 1988					
AT 11:00 AND WAS ACCOMPANIED BY					
IT SHOULD BE NOTED THAT ALSO ADVISED THAT					
HAS PROVIDED AN AFFIDAVIT TO THE U.S. SENATE ETHICS COMMITTEE					
CONCERNING THIS MATTER. WAS UNCLEAR AS TO WHETHER					
HAD PROVIDED AN AFFIDAVIT OR THERE WAS A PROPOSED					
INTERVIEW BY THE SENATE ETHICS COMMITTEE.					
SACRAMENTO DIVISION AT SACRAMENTO, CALIFORNIA. WILL					
INTERVIEW AND REGARDING THE					
TELEPHONE CALL FROM U.S. SENATOR DENNIS DE CONCINI IN REGARDS TO					
THE PROPOSED SALE OF LSL TO AND THE MEETINGS IN 1988					
WITH KEATING. A COPY OF AFFIDAVIT SHOULD ALSO BE					
OBTAINED. INTERVIEW REGARDING SOURCE OF HIS INFORMATION					

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^PAGE FIVE PX 58C-41605 UNCLAS

CONCERNING THE SALE OF LSL AND IF HE HAS BEEN INTERVIEWED BY THE SENATE ETHICS COMMITTEE. OBTAIN A COPY OF HIS

AFFIDAVIT. SACRAMENTO SHOULD ALSO INQUIRE THESE INDIVIDUALS IF THEY RECEIVED ANY OTHER TELEPHONE CALLS FROM ANY PUBLIC OFFICIAL REGARDING KEATING, HIS ASSOCIATES AND HIS BUSINESS ENTITIES.

BT

FBI

FRANSMIT VIA: Teletype Facsimile AIRTEL	PRECEDENCE: Immediate Priority Routine	CLASSIFICATIO TOP SECRET SECRET CONFIDENT UNCLAS E F UNCLAS Date 3/21	IAL TO
F0 DTDT-070			
TO : DIRECTO: (ATTN:	SSA SSA	PUBLIC CORRUPTIO	N UNIT)
FROM : SAC, PHO	OENIX (58C-PX-4160	05) (P)	
ALAN CR JOHN GL CHARLES LINCOLN OF CALI	IONS CONCERNING U. ANSTON, DENNIS D. ENN, JOHN MC CAIN, H. KEATING, JR., SAVINGS AND LOAN FORNIA (LSL) AND A	DE CONCINI, DONALD RIEGLE; dba ASSOCIATION AMERICAN	
PHOENIX CORRUPT	NTAL CORPORATION (, ARIZONA; ION OF FEDERAL PUP LS-LEGISLATIVE; /LA	•	
Re Bure 761 and LHM dated	au tel to Phoenix 12/19/89.	dated 2/22/90 an	d Phoenix FD-
addresses allegat senators. KEATING contributed appro- the five senators	ormation of receivions of regulatory G and employees of ximately \$200,000, as well as over on committees asso	y intervention by his affiliated to the election \$1 million in ad	the above companies campaigns of ditional funds
	was summoned to talone with Senat	the office of Secors DE CONCINI,	
2-Bureau 2-Cincinnati 2-Los Angeles (SA	1- RA) 1-	-New York (info) -San Francisco (i -Seattle (info)	nfo)
1-Miami (info) 1-Milwaukee (info 2-Phoenix JDN:rh (17)		-Springfield _ -WMFO	1.1.1.20
			-

58 CP, 41-15- 43 \$

Loan Bank examination of LINCOLN SAVINGS AND LOAN (LSL) conducted by the San Francisco District. The senators lobbied on behalf of LSL and attempted to obtain concessions for LSL. On 4/9/87, regulators from the Federal Home Loan Bank of San Francisco met with Senators DE CONCINI, RIEGLE, GLENN, and MC CAIN as well as a brief appearance by CRANSTON, to discuss the findings of the Federal Home Loan Bank of San Francisco's examination of LSL. Again, the senators appeared to lobby the position of LSL by questioning regulatory findings and recommendations.

Subsequent actions and inactions on the part of the
Federal Home Loan Bank Board to react to the recommendations of
the Federal Home Loan Bank of San Francisco's examination
findings and recommendations have <u>resulted</u> in allegations <u>focus</u> ed
upon regulatory intervention with and his successor,
The issue was ultimately resolved by a July 1988
re-examination of LSL which disclosed numerous violations of
regulatory guidelines and apparent criminal irregularities
warranting the placement of LSL into conservatorship on 4/14/89.
The potential loss to the insured deposit fund and the American
taxpayer is reported to be approximately \$2 billion.

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Receiving offices provided with informational copies will be notified by Phoenix and Los Angeles Division's when investigation is to be conducted within their divisional boundaries and appropriate notification will be provided at that time with the necessary details.

LEADS:

CINCINNATI DIVISION

AT COLUMBUS, OHIO

During the period of late 1985 to March 1986, KEATING and his affiliated companies contributed \$200,000 to the National Council on Public Policy, a tax-exempt Political Action Committee (PAC) affiliated with Senator JOHN GLENN.

Investigation has disclosed KEATING and his affiliated companies had already contributed the maximum allowable amount to registered tax-exempt PAC's for the year and therefore instructed GLENN's office the contribution should be applied to non-federal "soft money" purposes rather than federal "hard money" purposes. Senator GLENN stated the funds went to his non-federal political action committee to be used for state and local campaigns, while discussing the issue during a TV interview with DAVID BRINKLEY.

Cincinnati Division should contact the appropriate officials within the Ohio Attorney General's Office and conduct interviews concerning state reporting requirements and regulations for non-federal Political Action Committee activities as they pertain to state and local election campaigns. Once the state reporting requirements are disclosed, determine whether Senator GLENN's non-federal "soft money" Political Action Committee, which also does business under the name National Council on Public Policy, complies with all appropriate state regulations. Conduct all logical investigation necessary to disclose bank accounts, regulatory filings, and activities of said non-federal PAC which addresses state and local campaign issues under the name National Council on Public Policy. Should bank accounts be identified, notify Phoenix Division for issuance of Grand Jury Subpoenas.

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SPRINGFIELD DIVISION

AT SPRINGFIELD, ILLINOIS

of the Office of Will locate and interview Thrift Supervision, formerly Federal Home Loan Bank, Seattle, Illinois, regarding his participation in the July 1988 examination of LSL and ACC. Issues to be addressed should be all aspects of the exam, to include but not limited to, instructions regarding the review of the 1986 Federal Home Loan Bank of San Francisco examination report and supporting work papers, the scope of the examination, discussions with other examiners, rumors of the examination being a "whitewash", reported claims that examiners were instructed to overlook certain aspects of the examination, and any other unusual circumstances surrounding the It should be determined whether there was any attempt, implied or direct, to influence the examiners objectivity to critical issues. Additional issues should include the precedent for such an exam utilizing personnel from numerous districts, opinion of the 1986 San Francisco exam findings and whether their 1988 examination supported San Francisco District's findings and recommendations to the bank board, and whether a standard examination format was utilized in the 1986 San Francisco District exam and the 1988 examination in which TAYLOR participated. Finally, it should be determined if the 1988 examination differed materially from the 1986 San Francisco District examination in the areas of scope, findings, and resulting recommendations, and what the perceived underlying reasons for those difference may have been.

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WASHINGTON METROPOLITAN FIELD OFFICE

AT WASHINGTON, DC

- 1) Will contact the Office of Public Records, Room 1036, U.S. House of Representatives, Longworth Office Building, Capitol Hill, Washington, DC and obtain a listing of all lobbyists associated with a) CHARLES H. KEATING, JR., b) AMERICAN CONTINENTAL CORPORATION, c) LINCOLN SAVINGS AND LOAN ASSOCIATION, d) FIRST LINCOLN FINANCIAL CORPORATION, e) AMCOR FUNDING CORPORATION, f) AMCOR INVESTMENTS CORPORATION, g) PHOENICIAN FINANCIAL CORPORATION, h) LINFIN CORPORATION.
- 2) Will also obtain from the Office of Public Records, a listing of all lobbyists of record who were hired to lobby the Federal Home Loan Bank Board, Federal Savings and Loan Insurance Company (FSLIC), Office of Thrift Supervision, as well as Senators ALAN CRANSTON, DENNIS DE CONCINI, JOHN GLENN, JOHN MC CAIN, and DONALD RIEGLE.

3) Will locate and interview
of the Association of Thrift Holding Companies, Washington, DC,
concerning his contacting of
offer her a job with a California "member".
the Agency Group, Federal Home Loan Bank,
San Francisco, California, shortly before contacted
At the time contacted
she was an attorney at the bank board in Washington, DC. When
learned that the California "member" was LSL, she
became uneasy because of new position as a
regulator for the San Francisco District within which LSL is
located. continued to call her and she eventually had to
ask to stop calling.
WMFO should determine when was hired to solicit
employment and who hired him for ACC/LSL. Full
details concerning job duties, salary, fringe benefits, etc.,
which was prepared to offer should also be obtained, as
well as any instructions provided by ACC/LSL personnel pertaining
to the solicitation. Further, as LSL is located in Irvine,
California, with headquarters in Phoenix, Arizona, where did
propose that work for LSL as no apparent branches
are located within the San Francisco. California area.

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Due to the complex and sensitive nature of caption investigation, the following leads will be conducted by Phoenix/Los Angeles Agents with the concurrence of the appropriate SAC's. A teletype will be submitted to the appropriate Division confirming SAC concurrence regarding travel of Phoenix/Los Angeles Agents. The teletype will also provide travel itineraries for Agents and outline the scope of the investigation being conducted within that Division.

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PHOENIX DIVISION

AT PHOENIX, ARIZONA
n) wing the terminal mineral mineral
1) Will interview Federal Election
Commission, Washington, DC, concerning all political action
committees associated with the five senators, as well as attempt
to identify non-federal political action committee affiliations.
Investigation was conducted 2/8/90 and Phoenix Division continues
its record review upon receipt of documents from
O. Will a server Green in Torons Gubracons un
2) Will serve Grand Jury Subpoena upරිබි
records relating to
Subpoena was served 2/8/90 and record review to
follow upon receipt of records.
2) Will submoons OMS Washington DC for records of
3) Will subpoena OTS, Washington, DC, for records of
Federal Home Loan Bank employees related to contacts with LSL,
ACC, CHARLES H. KEATING, JR., or other affiliated companies. Subpoens was served to OTS. General Counsel.
2/8/90. Record review to follow upon receipt of documents.
4) Will subpoena National Council on Public Policy for
4) WIII Suppoend National Council on Public Folicy for
records detailing donations, disbursements, etc. Subpoena was served upon on 2/9/90. Record review to follow
upon receipt of documents.
5) Will subpoena former Federal Home Loan
Bank Board member for records related to contacts with LSL, ACC,
KEATING, and other affiliated companies and members of Congress.
Subpoena was forwarded to the Milwaukee Division by facsimile on
2/12/90. Record review to follow upon receipt of documents.
2/12/90. Record review to follow upon receipt of documents.
6) Will subpoena former Federal Home
Loan Bank Board member for records related to contacts with LSL,
ACC, KEATING and his affiliated companies, as well as members of
Congress. Subpoena was forwarded to New York City Division by
congress. Suppoend was forwarded to new fork city bivibion of

facsimile on 2/12/90. Record review to follow upon receipt of documents.

7) Will review KENNETH LEVENTHAL AND COMPANY report dated 7/14/89 addressing 15 transactions of LSL from which they claimed \$135 million in profit. Will interview officials associated with the examination, to include but not limited to who testified before the Committee on Banking regarding said transactions and the financial concerns raised by the transactions. When did KLEC start land

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- 8) Will review original records and work papers of ARTHUR YOUNG, Certified Public Accountants, audits of LSL as scheduled for March 26, 1990. Will attempt to identify and obtain interviews of officials/personnel associated with the audit and determine what ACC/LSL expected from ARTHUR YOUNG, difference in accounting principles as they pertained to recognition of profit/loss and the conditions which led to ARTHUR YOUNG's dismissal/withdrawal from ACC/LSL audit. Will also attempt to obtain an interview with who wrote the Senators regarding the unfairness of the Federal Home Loan Bank of San Francisco's exam of LSL and who reportedly met with Senator RIEGLE on February 26, 1987.
- 9) Will locate and review ACC/LSL records in the Phoenix, Arizona depository relating to business dealings between KEATING and Locate and review ACC/LSL records in the Phoenix, Arizona depository relating to business dealings between Locate and review ACC/LSL records in the Phoenix, Arizona depository relating to business dealings between Locate and review ACC/LSL records in the
- 10) Will review ACC's pilot logs located within Phoenix Division evidence to obtain details of MC CAIN's vacations in the Bahamas and other travel at KEATING's expense. Will also attempt to identify travel by other senators utilizing ACC's corporate jets.
- 11) Will locate and review LSL records relating to loans made to R. A. HOLMES, a development company two unpaid members of DE CONCINI's campaign staff.
- 12) Will serve Grand Jury Subpoena provided by Santa
 Ana RA upon and attempt to obtain an interview regarding

 Serving

Subverse:

13) Will interview former Arizona Governor BRUCE
BABBITT concerning reportedly unsuccessful attempts by KEATING to
influence BABBITT in his behalf.

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las o
14) Will interview Scottsdale, Arizona, Mayor HERB DRINKWATER concerning reportedly unsuccessful attempts by KEATING to influence DRINKWATER in his behalf.
15) Will interview b6
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AT TUCSON, ARIZONA
Interview who has a reputation as a "traditionalist" operator of thrift institutions. It will be determined purported duties as the conew president of LSL in November 1987 as well as the circumstances surrounding his employment, short tenure, and subsequent resignation.
AT MEQUON, WISCONSIN
Will interview , former member of the Federal Home Loan Bank Board regarding ACC/LSL lobbying and exerting pressure upon board members to vote upon issues in a manner favorable to LSL. Also to be addressed will be details surrounding a secret file provided by KEATING to and other board members concerning the Federal Home Loan Bank Board's 11th District in San Francisco, California.
AT NEW YORK CITY, NEW YORK
1) Will interview former Federal Home Loan Bank Board member regarding ACC/LSL lobbying and exerting pressure upon board members to vote upon issues in a manner favorable to LSL Will also address details surrounding the investigation of and his reported association to KEATING and his affiliated companies.
2) Will interview former U.S. Treasury Department official regarding his reported comment that KEATING bragged to him about his political influence and his job offer to former Federal Home Loan Bank Board
AT SAN FRANCISCO, CALIFORNIA Done
Will review Federal Home Loan Bank Board, San Francisco District, 1986 examination report of LSL and available work papers dealing with critical issues and interview/re-interview San Francisco District examiners regarding issues raised by as well as other

...

Washington, DC supervision concerning San Francisco District's inadequate examination and lack of sufficient evidence to warrant the appointment of a conservator or a cease and desist order as recommended. Individuals to be interviewed/re-interviewed shall include but not be limited to
other officials associated with the
1986 examination of LSL.
AT WASHINGTON, DC
Will interview
Will locate and interview Principal Supervisory Agent, Office of Thrift Supervision, Seattle, Washington, concerning his opposition to a proposal that LSL's supervisory district be transferred from San Francisco to Seattle, Washington.
On 2/19/88, ACC/LSL personnel met with Federal Home Loan Bank of Seattle's supervision at the suggestion of Acting Principal Supervisory Agent of the Office of Regulatory Activities, Federal Home Loan Bank Board, Washington, DC. suggested that the Seattle supervision meet with LSL/ACC personnel to discuss the possibility of transferring supervision from the Federal Home Loan Bank of San Francisco to Seattle should LSL/ACC acquire an institution within the territory of the Seattle District. has stated that after the Seattle District completed its review, the Principal Supervisory Agent contacted him to explain that Seattle District had decided to make a recommendation which would show support for a fellow district. On 3/11/88, the Federal Home Loan Bank of Seattle submitted a memorandum opposing the proposed transfer of supervision as it would set a bad precedent. Furthermore, the Federal Home Loan Bank of Seattle believed LSL was engaged in a delaying tactic to thwart regulatory action as long as possible.

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Will obtain details of the LSL/ACC contacts with the Federal Home Loan Bank of Seattle prior to the meeting of 2/19/88. It will be determined what proposals and concessions LSL/ACC made to the Seattle District in an attempt to gain their support for the proposal. Should any Federal Home Loan Bank of Seattle employees have received job offers from LSL/ACC near this time period, those individuals will be identified and interviewed concerning all aspects of the job offer.

Faulstich will be interviewed concerning any outside influence being exerted upon himself or others involved in the assessment, to include Washington, DC supervision. This questioning should include the overall nature of the request by DOCHOW for Seattle District to meet with LSL/ACC officials and discuss an issue with little or no precedence and whether undue criticism of Federal Home Loan Bank, San Francisco, was conveyed in an apparent effort to influence Federal Home Loan Bank, Seattle's recommendation.

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LOS ANGELES DIVISION

AT SANTA ANA, CALIFORNIA

1) Will subpoena California Democratic party for cords relating to an \$85,000 contribution by AMERICAN CONTINENTAL CORPORATION (ACC) in 1986, which was reportedly spent for Senator ALAN CRANSTON's re-election effort. Record reviews should follow along with interviews of appropriate California Democratic party officials.
2) Will interview Los Angeles, California, regarding circumstances of a) \$100,000 he reportedly raised for the Republican party from KEATING and his associates, b) \$172,000 he reportedly raised for California Governor GEORGE DEUKMEJIAN from KEATING and his associates, and c) lobbying to be conducted on behalf of KEATING.
3) Will subpoena and review records of the Center for Participation in Democracy, Los Angeles, California, The Organizing Institute, Pacific Grove, California, The Forum Institute, Washington, DC, and U.S.A. Votes (New Dimension Resources), Washington, DC. Investigative leads will be set upon the conclusion of the record reviews.
4) Will interview appraiser Altos, California, and review real property records in connection with appraisal of property located at 215 Main Street, Los Altos, California, showing title in the name of ALAN CRANSTON. Will also interview former LSL employee concerning the contemplation by LSL to provide a loan to CRANSTON for the Los Altos property in October 1986. Interviews have been concluded by Santa Ana RA on January 31, 1990 and February 5, 1990, respectively.
5) Will interview Center for Participation b6 in Democracy Fund Raiser regarding the \$400,000 contribution to Center for Participation in Democracy made by ACC on 2/10/88.
6) Will interview regarding a dinner she attended with ALAN CRANSTON, and KEATING on 1/8/88.
7) Will interview regarding the \$400,000 contribution to Center for Participation in Democracy made by ACC on 2/10/88. to Phoenix when 6c

58C-PX-41605 JDN:rh 8) Will subpoena relevant records in possession of has already been a U.S.A. Votes Fundraiser. interviewed by Santa Ana RA. 9) Will follow-up on source information that CRANSTON may have received two unsecured loans of approximately \$200,000 each in 1988 from MERCURY SAVINGS, Los Angeles, California. such loans were disclosed upon CRANSTON's Senate Disclosure Forms. 10) Will provide Phoenix Division with a Grand Jury records regarding Subpoena for AT PHOENIX, ARIZONA Will review Federal Home Loan Bank records stored at the Phoenix, Arizona Depository regarding contacts between regulators and the United States Senators. AT WASHINGTON, DC 1) Will interview regarding services she or CRANSTON performed on behalf of KEATING and his affiliated companies.

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performed on behalf of KEATING and his affiliated companies.

3) Will interview who sought CRANSTON's assistance in obtaining Federal Home Loan Bank Board approval of his proposed purchase of LSL from ACC in 1989.

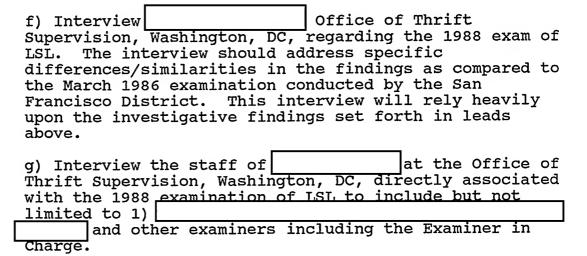
his staff, or CRANSTON

2) Will interview ____ regarding services

Upon the completion of the aforementioned investigative leads, the following investigation will be conducted by Phoenix/Los Angeles Agents with the concurrence of appropriate SAC's:

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a) Re-interview Federal Home Loan Bank Board, at Miami. Florida. regarding allegations he instructed to leak confidential information regarding ACC/LSL, allegations concerning former Speaker of the House. JI WRIGHT, and SARATOGA SAVINGS AND LOAN, affair wherein allegedly acted on their behalf and support or criticism of the San Francisco District's March 1986 examination of LSL and their recommended actions.	
b) Locate and interview and supervision of the Federal Home Loan Bank Board concerning his assessment of the San Francisco District's March 1986 examination of LSL and his support for action based upon this exam. It should also be determined whether memorandum date 7/23/87 recommending regulatory action against LSL led to his dismissal or resignation from the Federal Home Loan Bank Board.	
c) Interview Office of Thrift Supervision, Washington, DC, regarding her 407-Investigation of LSI concerning "file stuffing" to bolster and enhance inadequately documented loan files.	3
d) Interview regarding conversation	ıs
e) Interview Farm Credit Administration official, Washington, DC, who reportedly witnessed conversation with in late 1987 or early 1988 concerning CHARLES H. KEATING, JR.'s influence with the Washington, DC Federal Home Loan Bank Board and the effort to move the exam process from San Francisco, California to Washington, DC.	



- h) Interview Enforcement Regulatory Commission, Office of Thrift Supervision, Washington, DC with the detailed specifics of the San Francisco District's 1986 examination findings as compared to the Washington 1988 exam findings and address each issue she made during her 11/21/89 testimony to the committee on banking which discredited the San Francisco District exam and heaped laudatory praise upon herself despite the belated action taken against LSL.
- i) Interview Office of Thrift Supervision, Washington, DC, with detail specifics of the San Francisco District's 1986 examination findings as compared to the 1988 exam findings of LSL and address each issue he made during his 11/21/89 testimony before the Committee on Banking to discredit the San Francisco District's regulatory recommendations and justify the bank board's lack of action against LSL until 4/14/89.
- j) Interview senators and congressmen who received campaign contributions raised by CHARLES H. KEATING, JR., and his affiliated companies and those who met with KEATING in order to learn whether KEATING solicited favors from these congressmen as well. Investigation to date has disclosed these politicians include Senators WILSON, HAWKINS, MATTINGLY, and WIRTH, as well as Congressman PASHAYAN, BARNARD, and former Congressman JACK KEMP, currently serving as Secretary for Housing and Urban Development.

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	White House Chief of Staff, DONALD
	knowledge of 1) KEATING pressure
	2) KEATING's influence on the
nomination of	
and (FIRST NAME UNK	NOWN) to the Federal Home
Loan Bank Board.	`

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	ANSMIT VIA: Teletype Facsimile	PRECEDENCE: Immediate Priority Routine	CLASSIFICATION: TOP SECRET SECRET CONFIDENTIAL UNCLAS E F T O UNCLAS Date	
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3	FBI LOS ANGELES/R		•	
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	SUBJECT: ALLEGAT	IONS CONCERNING U	.s. SENATORS ALAN CRANSTON,	
			N MC CAIN, DONALD RIEGLE;	
			LN SAVINGS AND LOAN ASSOCIATI	ОИ
)			CONTINENTAL CORPORATION (ACC)	
		1	DERAL PUBLIC OFFICIALS -	,
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FEDERAL HOME LOAN BANK BOARD (FHLBB), ON APRIL 2, 1987, AND WITH SUBSEQUENT MEETINGS WITH OFFICIALS FROM THE FEDERAL HOME LOAN BANK OF SAN FRANCISCO ON APRIL 9, 1987. INVESTIGATION HAS SHOWN KEATING WAS A MAJOR CONTRIBUTOR TO THE SENATORS AND DURING THE MEETINGS WITH THE FHLBB AND THE FEDERAL HOME LOAN BANK OF SAN FRANCISCO, OFFICIALS QUESTIONED THESE INDIVIDUALS CONCERNING LSLA.

AND THE SAN FRANCISCO BANK OFFICIALS HAVE BEEN INTERVIEWED AND ALL CHARACTERIZE THE CONTACTS BY THE U.S. SENATORS AND UNUSUAL AND INAPPROPRIATE. THE DEPARTMENT OF JUSTICE HAS REQUESTED THE FBI TO INVESTIGATE THIS MATTER.

AFTER			
		SHORTLY A	4FTER
	THE SUPERVISO	ORY AUTHORITY	WAS REMOVED
FROM THE ELEVENTH DISTRIC	T (SAN FRANCIS	SCO) AND A NAT	CIONAL EXAM
TEAM WAS FORMED AND COORD	INATED FROM TI	HE FHLBB IN W	ASHINGTON,

D.C.

INVESTIGATION HAS RECENTLY SHOWN THAT SOME OF THE NATIONAL EXAM TEAM MEMBERS VOICED CONCERN TO SUPERVISORS THAT THIS EXAM WHICH BEGAN IN JULY OF 1988 OF THE THRIFT AND THE HOLDING COMPANY

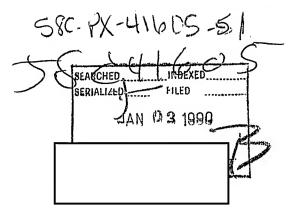
^PAGE THREE DE PX 58C-PX-41605 UNCLAS IN AUGUST OF 1988 WERE "WHITEWASHES". IS ONE SUCH EXAMINER THAT WAS ASSIGNED FROM THE SEATTLE DISTRICT OF THE FEDERAL HOME LOAN BANK. WORKED FOR THE EXAMINER IN CHARGE OF LENDING AND REAL ESTATE INVESTMENTS, WHO APPARENTLY INSTRUCTED TO WRITE HER EXAMINATION IN A CERTAIN METHOD WHICH DID NOT MEET WITH AGREEMENT FROM HER. APPARENTLY WROTE MEMOS EXPRESSING HER CONCERNING OVER BEING TOLD WHAT AND HOW TO EVALUATE HER FINDINGS. IS CURRENTLY INVOLVED IN EXAMINATION OF TRIDENT SAVINGS AND LOAN ASSOCIATION OF LANOKA HARBOR, NEW JERSEY, AND CAN BE REACHED AT ON APRIL 18, 1990, PHOENIX CASE AGENT CONVERSED BRIEFLY WITH AND IT WAS DETERMINED HER RESIDENCE IS PORTLAND, OREGON, HOWEVER, SHE WOULD BE RETURNING TO LANOKA HARBOR, NEW JERSEY, ON APRIL 24, 1990. AGREED TO BE INTERVIEWED BY THE FBI UPON HER RETURN TO NEW JERSEY. SHE FURTHER STATED SHE WOULD BRING HER PERSONAL NOTES AND MEMOS WHICH REFLECT HER CONCERN FOR THE EXAM METHODOLOGY.

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			l l	WHO	CAN	BE	REA	CHED	THR	OUGH	THE	TRID	ENT	SAVINGS
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6	CITE: //3410:0670/	/		•
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8	SUBJECT: ALLEGATION	ns concerning t	J.S. SENATORS ALAN	CRANSTON,
9	DENNIS DECONCINI, J	OHN GLENN, JOHN	N MCCAIN, DONALD R	IEGLE;
10	CHARLES H. KEATING,	JR., DBA LINCO	OLN SAVINGS AND LO.	AN
11	ASSOCIATION, IRVINE	, CALIFORNIA, A	AND AMERICAN CONTI	NENTAL
13	CORPORATION, PHOENI	X, ARIZONA; COI	RRUPTION OF FEDERA	L PUBLIC
14	OFFICIALS - LEGISLA	TIVE; 00: PX/1	LA.	
15	FOR INFORMATIO	N OF TAMPA, TH	IS INVESTIGATION I	NVOLVES
16	WELL-PUBLICIZED ALL	EGATIONS THAT	CAPTIONED U.S. SEN	ATORS
17	INTERCEDED ON SUBJE	CT CHARLES H. I	KEATING'S BEHALF W	ITH FEDERAL
18	HOME LOAN BANK BOAR	D (FHLBB) REGUI	LATORS, IN EXCHANG	E FOR
19 20	JAJ/cpt (1)	,		
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PAGE TWO (58C-PX-41605)

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CONTRIBUTIONS TO THE SENATORS' CAMPAIGNS, POLITICAL ACTION
COMMITTEES, AND CRANSTON'S VOTER REGISTRATION GROUPS. THE
ALLEGED INTERFERENCE WAS ON BEHALF OF TROUBLED LINCOLN SAVINGS
AND LOAN ASSOCIATION (LSL), WHICH WAS ULTIMATELY PLACED IN
CONSERVATORSHIP BY THE FHLBB ON 4/14/89. INVESTIGATION IS
FOCUSING ON SENATOR CRANSTON, AND THE PATTERN OF SERVICES
PERFORMED BY CRANSTON FOR KEATING CLOSE IN TIME TO KEATING
CONTRIBUTIONS TO CRANSTON ORGANIZATIONS.

INVESTIGATION HAS REVEALED THAT CRANSTON OBTAINED AN APPROXIMATELY \$250,000 UNSECURED LINE OF CREDIT FROM LSL IN OCTOBER 1986. CRANSTON OBTAINED THE LINE OF CREDIT TO PAY FOR LAST MINUTE ADVERTISING IN HIS 1986 SENATORIAL CAMPAIGN.

THESE FUNDS WERE NOT NEEDED, SO CRANSTON DID NOT DRAW ON THE LSL LINE OF CREDIT.

WAS A PARALEGAL IN LSL'S LOAN DEPARTMENT IN

1986, AND SHE PROCESSED THE CRANSTON LOAN APPLICATION.

SUBMITTED A SHORT AFFIDAVIT TO THE SENATE ETHICS COMMITTEE IN

APRIL 1990. IN HER AFFIDAVIT, SHE SAID SHE DID NOT RECALL THE

SPECIFIC TERMS OF THE CRANSTON LINE OF CREDIT.

ALSO

STATED THAT SHE ARRANGED FOR THE PERSONAL DELIVERY OF THE LOAN

DOCUMENTS TO CRANSTON BY PERSONALLY FLYING FROM PHOENIX,

ARIZONA, TO LOS ANGELES, CALIFORNIA, WHERE SHE MET CRANSTON,

CRANSTON'S ATTORNEY,

AND TWO OR THREE UNNAMED

CRANSTON AIDES. CRANSTON'S ATTORNEY REVIEWED THE LOAN

DOCUMENTS, AND

DROVE WITH THE CRANSTONS AND CRANSTON'S

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PAGE THREE (58C-PX-41605)
ATTORNEY TO DOWNTOWN LOS ANGELES WHILE CRANSTON
SIGNED THE DOCUMENTS.

LEADS, TAMPA DIVISION AT PALM HARBOR, FLORIDA: INTERVIEW PALM HARBOR, FLORIDA, 34683, REGARDING HER KNOWLEDGE OF THE LSL LINE OF CREDIT TO CRANSTON. THE INTERVIEW SHOULD INCLUDE THE FOLLOWING POINTS: ASCERTAIN THE DATES ON WHICH FIRST LEARNED OF THE CRANSTON LOAN FILE, AND WHEN SHE MET CRANSTON AT THE LOS ANGELES AIRPORT. WAS SHE INSTRUCTED TO EXPEDITE THE LOAN PROCESS? WAS THE LOAN PROCESS IN FACT EXPEDITED? WAS THE CRANSTON LOAN OTHERWISE HANDLED IN A TYPICAL MANNER? WERE NORMAL CREDIT CHECKS, ETC., COMPLETED? WAS THIS TYPE OF UNSECURED LINE OF CREDIT A TYPICAL LOAN OF LSL? IN HER MEETING WITH CRANSTON AND HIS AIDES, DID ANYONE MENTION WHAT CRANSTON HAD DONE OR WOULD DO FOR LSL? DID SHE EVER HEAR ANYONE AT LSL COMMENT ON THE CIRCUMSTANCES SURROUNDING THE ORIGIN OF THE CRANSTON LOAN, OR THE REASON WHY THE LINE OF CREDIT WAS EXTENDED?

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Memorandum



To :	SAC, PHOENIX 58C-PX-41605	Date	3/6/91	
From :	SAA			b6 b7С
Subject:	DONALD RIEGLE ET AL PUBLIC CORRUPTION-LEGISLATI (00:PX)	IVE		
information the Pontian to any except the Pontian to any except for any four furnished CID Chief' regarding passed on contact him.	on 3/6/91 teleph state that CID of IRS, Detron gathering assignment to ward ac, Michigan CID office. Change of information or joundation for IRS criminal in his telephone number as and his telephone number as and his telephone des advised to the FBI agents working the im if IRS CID was needed or available for disseminations.	roit, Michigan havhich he is assi advised he in a criminal involvement exist He celephone number proving his assume the information if information	as opened an gned out of would be open westigation ed. furnished the as ignment would be hey would	b6 b7С
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3/14/ Come of	would want an mett for (if he	ry wife the roles) oba	et may	ъ6 ъ7С
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	FBI
	TRANSMIT VIA: PRECEDENCE: Immediate TOP SECRET Facsimile Priority Routine UNCLAS F T O UNCLAS
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2	TO DIRECTOR FBI/ROUTINE/
3	FBI PHOENIX (58C-PX-41605)/ROUTINE/
í	BT
s	UNCLAS
5 7	PASS: PUBLIC CORRUPTION UNIT, SSA
3	SUBJECT: ALLEGATIONS CONCERNING U.S. SENATORS ALAN CRANSTON,
o l	ET AL; CHARLES H. KEATING, JR., DBA LINCOLN SAVINGS AND LOAN
1	ASSOCIATION, AMERICAN CONTINENTAL CORPORATION; CORRUPTION OF
2	PUBLIC OFFICIALS - LEGISLATIVE; OO: PHOENIX/LOS ANGELES.
3	RE PHOENIX TELETYPE TO BUREAU DATED 3/7/91.
1	AUSA LOS ANGELES UNITED STATES
5	ATTORNEY'S OFFICE, HAS DECIDED THAT IT IS NO LONGER NECESSARY
(,	THAT THE INVESTIGATING AGENTS RECUSE THEMSELVES FROM ANY
7	
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	SJAJ/Clm
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SENATE ETHICS COMMITTEE TESTIMONY FOLLOWING THE GRANT OF			
IMMUNITY TO DECISION WAS BASED ON			
THE LACK OF EVIDENCE TO CHARGE WITH ANY CRIMINAL			
VIOLATION. THUS, ADDITIONAL SENATE ETHICS COMMITTEE			
TRANSCRIPTS AND DOCUMENTATION ARE AVAILABLE FOR REVIEW BY THE			
INVESTIGATING AGENTS.			
HOMEFED BANK, SAN DIEGO, CALIFORNIA, HAS RESPONDED TO			
A SUBPOENA DIRECTED TO HOMEFED FOR ANY RECORDS RELATING TO			
TRANSACTIONS WITH CRANSTON'S AIDE THIS			
SUBPOENA WAS PROMPTED BY INFORMATION DEVELOPED BY AUSA			
THAT MAY HAVE HAD AN UNDISCLOSED FINANCIAL			
RELATIONSHIP WITH HOMEFED BANK. HOMEFED BANK REPORTED THAT IT			
HAS NO RECORD OF ANY TRANSACTION WITH FOR THE PERIOD			
1985 TO THE PRESENT.			
A LEAD HAS BEEN SENT TO WMFO TO OBTAIN FINANCIAL 66			
REPORTS OF THE COMMITTEE FOR A DEMOCRATIC CONSENSUS (CDC)			
FILED WITH THE FEDERAL ELECTION COMMISSION. CDC IS A			
POLITICAL ACTION COMMITTEE AFFILIATED WITH CRANSTON.			
CRANSTON'S FUND RAISER ALSO RAISED FUNDS FOR CDC.			
CDC RECORDS ARE BEING OBTAINED TO DETERMINE WHETHER CDC WAS			
USED AS A CONDUIT TO CIRCUMVENT FEDERAL ELECTION LIMITATIONS			
ON POLITICAL CONTRIBUTIONS. CRANSTON'S 1986			

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CAMPAIGN FINANCE CHAIR FOR SOUTHERN CALIFORNIA AND A SUBJECT OF A LOS ANGELES 29 INVESTIGATION INVOLVING FAILED FINANCIAL INSTITUTION FIRST NETWORK, HAS ADVISED THAT HE COLLUDED WITH TO TRANSFER \$4,000 FROM CDC TO CRANSTON'S PRESIDENTIAL CAMPAIGN THROUGH POLITICAL ACTION COMMITTEE. LINCOLN SAVINGS' OUTSIDE ATTORNEY HAS ADVISED THAT IN 1989, HE CONTRIBUTED \$1,000 TO CDC AT THE REQUEST OF DELAWARE SENATORIAL CANDIDATE SAM BEARD. HAD CONTRIBUTED \$2,000 TO BEARD'S CAMPAIGN, BUT BEARD LOST IN THE PRIMARY, SO HAD TO REFUND \$1,000 TO BEARD THEN SUGGESTED THAT THE REFUNDED \$1,000 BE CONTRIBUTED TO CDC. FORMER LINCOLN SAVINGS LOAN DEPARTMENT PARALEGAL WAS INTERVIEWED BY THE TAMPA DIVISION. PREPARED THE LOAN DOCUMENTS FOR THE LINE OF CREDIT EXTENDED BY LINCOLN TO CRANSTON IN THE FALL OF 1986. ALSO TRAVELED TO LOS ANGELES AND MET WITH CRANSTON TO HAVE THE LOAN SAID SHE WAS INSTRUCTED TO NOT SHOW DOCUMENTS SIGNED. ON HER VOUCHER OR EXPENSE REPORT THE PURPOSE OF HER TRIP TO LOS ANGELES TO HAVE CRANSTON SIGN THE LOAN DOCUMENTS. SAID SHE WAS NOT TO MAKE ANY REFERENCE TO CRANSTON ON ANY OF HER PAPERWORK, AND WAS TO MERELY IDENTIFY IT AS AIR TRANSPORTATION TO LOS ANGELES CONCERNING A POTENTIAL LOAN.

STATED THAT THE CRANSTON LINE OF CREDIT RECEIVED

SPECIAL ATTENTION BECAUSE CRANSTON WAS INVOLVED. SHE SALD THE
LOAN WAS PROCESSED QUICKER THAN ANY OTHER LOAN THAT SHE HAD

BEEN INVOLVED WITH. SHE SAID LINCOLN WAS OVERLY

ACCOMMODATING, CITING HER FLIGHT TO LOS ANGELES TO HAVE THE

PAPERWORK SIGNED. EXPLAINED THAT ORIGINALLY THE LINE

OF CREDIT WAS TO BE SECURED BY REAL PROPERTY, BUT THAT

SOMETIME DURING THE APPROXIMATELY TWO WEEK PERIOD THAT THE
LOAN WAS PROCESSED, IT WAS DETERMINED THAT THE LINE OF CREDIT

WOULD BE UNSECURED, PROBABLY BECAUSE OF THE URGENCY.

A MEETING WITH THE LOS ANGELES U.S. ATTORNEY'S OFFICE IS ANTICIPATED WITHIN THE NEXT TWO OR THREE WEEKS FOR THE PURPOSE OF AGREEING ON THE DIRECTION OF FURTHER INVESTIGATION OF THIS MATTER. IN PREPARATION FOR THIS MEETING, LOS ANGELES AND PHOENIX AGENTS ARE ORGANIZING AND SUMMARIZING THE EVIDENCE OBTAINED TO DATE. THE U.S. ATTORNEY'S OFFICE HAS INDICATED TENTATIVELY THAT THE INVESTIGATION SHOULD FOCUS ON CRANSTON, AND THAT PROSECUTIONS OF SENATORS MCCAIN AND GLENN ARE LIKELY TO BE DECLINED. THE U.S. ATTORNEY'S OFFICE ALSO INTENDS TO CONSIDER DECLINING PROSECUTIONS OF SENATORS DECONCINI AND

RIEGLE FOR LACK OF EVIDENCE THAT A VIOLATION HAS OCCURRED. IT IS EXPECTED THAT THE INVESTIGATION OF CRANSTON WILL CONTINUE. BT

TRANSMIT VIA: Teletype	PRECEDENCE: ☐ Immediate ☐ Priority ☑ Routine	CLASSIFICATION TOP SECRET SECRET CONFIDENTI UNCLAS E F UNCLAS	AL
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ANA RA, SA			
SUBJECT: ALLEGATION	s concerning u.s.	SENATORS ALAN CF	RANSTON,
ET AL; CHARLES H. KE	ATING, JR., DBA L	INCOLN SAVINGS AN	ID LOAN
ASSOCIATION, AMERICA	N CONTINENTAL COR	PORATION; CORRUPT	CION OF
PUBLIC OFFICIALS-LEG	ISLATIVE; OO: PX,	/LA.	
RE LOS ANGELES	TEL TO THE BUREAU	, 3/21/91.	
THE FOLLOWING I	NVESTIGATION HAS	BEEN CONDUCTED BY	THE FBI
SINCE REFERENCED TEL	ETYPE AS FOLLOWS:	THE FEDERAL ELE	CTION
COMMISSION (FEC) HAS	PROVIDED DISCLOS	URE FORMS WITH RE	CEIPTS
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TRANSMIT VIA: Teletype Facsimile AIRTEL	PRECEDENCE: Immediate Priority Routine	CLASSIFICATION: TOP SECRET SECRET CONFIDENTIAL UNCLAS E F T O UNCLAS
		Date 5/7/91
TO : SAC	LOS ANGELES	
FROM : SAC	PHOENIX (58C-PX-41)	505) (P)
ALAN CHAI LINC CALI CORI	EGATIONS CONCERNING OF CRANSTON, ET AL; RLES H. KEATING, JR. OLN SAVINGS AND LOAN FORNIA AND AMERICAN PORATION, PHOENIX ARE UPT PUBLIC OFFICIALS	, DBA ASSOCIATION, CONTINENTAL IZONA;
Attention: SA and has } Iter (27), (34), (44)	is evidend been requested to be ms of evidence is ma: 4), (45), (46), (47)	cover to Santa Ana R.A. ce that was reviewed by SA sent to Santa Ana. cked as follows: 1B(25), (50), (51), (59) item R-1, 1B(65) item 6, 9, and 14.
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3 - Los Angeles 2 - Phoenix JDN/skl (5)	(1 package copy) (ATTN SA Jaech) Manual S/7/6 Manual S/7/6 P46/452032	Sernalized.g

U.S. Department of Justice



Federal Bureau of Investigation

In Reply, Please Refer to File No. 58C-PX-41605

11000 Wilshire Boulevard #1700 Los Angeles, CA 90024 May 8, 1991

Public Records Office Federal Election Commission 999 E Street, Northwest Washington, D.C. 20463

Dear

This confirms a telephone conversation between Special Agent (SA) of our office and of your office on May 7, 1991, in which the following was discussed:

For investigative purposes, we request copies of records showing receipts and expenditures for the following organizations: (1) Cranston for President Committee for the years 1986 through 1990; (2) Cranston Super Celebration Inc. (connected to the Committee for a Democratic Consensus) for the years 1986 through 1990; (3) Friends of Sam Beard (C00214510) for the years 1989 and 1990; and (4) Pacific Pac (C00199851) for the years 1987 through 1990.

Our understanding is that these records will be provided without any cost to the Federal Bureau of Investigation (FBI). Please mail the copies to: Federal Bureau of Investigation, 901 West Civic Center Drive, Suite 400, Santa Ana, California, 92703, Attention: Jeffrey Jaech.

Thank you for your assistance.

Sincerely yours,

LAWRENCE G. LAWLER Special Agent in Charge

		Addressee	
\checkmark_1	_	Phoenix	
1	_	Los Angeles	(58C-PX-41605)
		-	(SARA)(P)

JAJ/cpt

Supervisory Special Agent

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FBI - PHOENIX

HOLDER OF THE CONTRACT OF THE

OLWINE, CONNELLY, CHASE, O'DONNELL & WEYHER

SUITE 1000

1701 PENNSYLVANIA AVENUE, N.W.

WASHINGTON, D.C. 20006

TELEPHONE: (202) 835-0500 FACSIMILE: (202) 835-1591

750 SEVENTH AVENUE NEW YORK, N.Y. 10019 (212) 261-8000 220 SUNRISE AVENUE PALM BEACH, FL. 33480 (407) 833-8722

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June 3, 1991

BY FEDERAL EXPRESS

Re: Senator Dennis DeConcini

Dear
This letter responds to your request for information about charitable contributions made by Charles Keating, American Continental Corporation or Lincoln Savings and Loan at the request of
It appears that requested a charitable contribution from Mr. Keating on only two occasions. The first occurred in November 1985 and concerned the Phoenix Memorial Hospital Intergenerational Child Care Center, later known as "Young Company."
At the request of the Phoenix Memorial Hospital Foundation, participated in a joint effort to raise funds to open the Intergentianal Child Care Center on the hospital campus. contacted approximately fifteen businesses in the Phoenix
area to solicit large donations for the Center. has long been interested in child care issues and sne considered the proposed Center unique because persons over 55 years of age would be employed as part-time care givers.
visited Mr. Keating to request a donation from American Continental Corporation. They approached Mr. Keating because, according to he was a previous donor to the Hospital. recollection is that Mr. Keating pledged a large amount — probably in the range of \$50,000, but possibly a greater sum to be paid over several years. Because and the Foundation handled all administrative matters, does not know whether American Continental Corporation in fact paid the promised amount, but she assumes it did because she has not heard otherwise. This was the only occasion on which

June 3, 1991 Page 2

one Mr. Keating made at

personally visited Mr. Keating to ask for a charitable contribution. second and only other contact with Mr. Keating concerning charitable contributions was by telephone. In 1987 or 1988 at the request of the Seton Catholic High School in Chandler, Arizona, telephoned Mr. Keating about contributing a large amount for a new gymnasium. called Mr. Keating because she was told by high school officials that Mr. Keating previously had promised the school that he would build a gymnasium for it. However, Mr. Keating told he would not be able to contribute because money was unavailable. before the The attached testimomy of Senate Ethics Committee suggests that, on more than one successfully requested a charitable occasion, contribution from Mr. Keating. As the above discussion shows, that is not so. The Phoenix Memorial Hospital Intergeneration Child Care Center contribution is the only

Please note that for many <u>vears -- and long</u> before Senator DeConcini ran for office -- has been an active fundraiser for charities that interest her. The following is a sample of the various organizations she has assisted in this fashion:

• US Senate Employees' Child Care Center: 1985-88

behest.

- The Catholic University of America, Washington, D.C.: 1985-87
- The Junior League of Tucson, Arizona, Inc.: 1960-1976
- The United Way of Tucson, Arizona: 1961-1964
- The Freedom from Hunger Foundation in Tucson, Arizona and Davis, California: 1982-89
- Kino School, Tucson, Arizona: 1975-90

June 3, 1991 Page 3

- "Young Company", an intergenerational child care center at Phoenix Memorial Hospital: 1985-86
- St. Mary's High School, Phoenix, Arizona: 1989-90
- The Brewster Home for unwed mothers, Tucson, Arizona: 1963-68
- Garden Park Enterprises for the mentally handicapped, Phoenix, Arizona: 1989-90
- The Volunteer Bureau, Tucson, Arizona: 1968-69

As this list demonstrates, two approaches to Mr. Keating were not in any way unusual or out of character.

I trust that the above anwers your questions.

Sincerely,		
(42)		

Federal Bureau of Investigation 201 East Indianola Suite 400 Phoenix, Arizona 85012

Enclosure

Un official Manscripe

COMMITTEE (See pp. 67-68)

HEARING OF THE SENATE SELECT ETHICS COMMITTEE

SUBJECT: "KEATING FIVE" INVESTIGATION

CHAIRED BY: SENATOR HOWELL HEFLIN (D-AL)

WITNESS:

JAMES GROGAN, LOBBYIST FOR CHARLES KEATING AND FORMER VICE PRESIDENT, AMERICAN CONTINENTAL CORPORATION

216 HART SENATE OFFICE BUILDING

P.M. SESSION FRIDAY, DECEMBER 14, 1990

Come to order. We apologize for the lateness SEN. HEFLIN: in getting started, but we've been endeavoring to work out schedules, and it's quite a problem. So we'll get started. Now, I would anticipate that we will be in session tomorrow, and I just alert everybody in regards to that.

Mr. Bennett, proceed.

SEN. RUDMAN: Mr. Chairman, I just thought I might just ask Mr. Bennett just for the defense counsel and their planning purposes and just curious myself, is it Mr. Bennett's feeling that he will finish direct today?

MR. BENNETT: Yes. Oh, yes.

SEN. RUDMAN: So that tomorrow would be for cross, and we might well get it done conceivably earlier than a normal day -possibly? I won't ask for a comment. I'm just making a speculation.

SEN. HEFLIN: In the form of a suggestion.

MR. TAYLOR: How is between 5:00 and 7:00 p.m., Mr. Vice (Laughter.) Chairman?

SEN. RUDMAN: The Chairman was advising was a speculation in the form of suggestion.

I was only suggesting that Mr. Bennett might --MR. TAYLOR:

SEN. RUDMAN: Right.

MR. BENNETT: (Off mike.) Would you locate the Special Counsel Exhibit 98, please? (Attaches microphone to tie.) What do you know about a fundraising event request for Senator Riegle to be sponsored by Mr. Keating or Lincoln?

MR. GROGAN: I recall a conversation I had with Jo Vincent.

MR. BENNETT: Who is Jo Vincent/

MR. BENNETT: At any time did Senator McCain communicate to you or to Mr. Keating that Senator DeConcini had asked him to do anything which he, Senator McCain, thought was improper?

MR. GROGAN: No. I never recall Senator McCain mentioning that to me, and I believe that I would recall it had that been an issue. I do not recall that being an issue because had that been raised that there was a conflict between Senator McCain and Senator DeConcini about the meeting, that's something — that would have been my responsibility to work on that conflict, and I just do not have any memory of that being an issue.

MR. BENNETT: Did you or Mr. Keating or anybody else at Lincoln ever request Senator DeConcini to fly to San Francisco to see the regulators?

MR. GROGAN: No, sir.

MR. BENNETT: What knowledge do you have, if any, regarding Mrs. McCain's investment in an entity called Fountain Square?

MR. GROGAN: I have no personal knowledge. Fountain Square was a limited partnership that our company presented to investors. I do know that people in the company have told me that it maybe was financially the best economic deal that we had --

MR. BENNETT: Well that doesn't matter.

MR. GROGAN: -- and that she and her family invested in that deal in an arms-length transaction that had nothing to do with Senator McCain.

MR. BENNETT: Who in her family are we talking about?

MR. GROGAN: I believe it was her father.

MR. BENNETT: Let me ask you this as my final -- my final questions. You've testified at length about contributions of hard, soft, whatever.

MR. GROGAN: Yes, sir.

MR. BENNETT: Do you know if any of the senators under inquiry, any of the five senators under inquiry, have any -- and you've talked about Senator Cranston and that line of credit -- other than those, do you know of any transactions, agreements, financial relationships between any of the senators and Lincoln or ACC or any of their subsidiaries or wholly-owned subsidiaries or partially-owned subsidiaries or you or Mr. Keating called them?

MR. GROGAN: I know of none, and I believe there are none.

MR. BENNETT: What about as to staffs of these senators, to your knowledge?

MR. GROGAN: I know of none, and I believe there are none.

MR. BENNETT: Did any members of any of these senators'

families ever solicit from you or Mr. Keating or Lincoln any contributions of any kind?

MR. GROGAN: I know that Mrs. DeConcini is very active in the community in Arizona and volunteers on a variety of charitable organizations and at times she solicited charitable contributions from Mr. Keating, and I know that Kim (?) Cranston was very active in the voter registration efforts. I don't have a specific recollection of him specifically asking Mr. Keating for money, but I was at meetings where he discussed the voter registration and pitched, if you will, how important he felt it was.

MR. BENNETT: As to Mrs. DeConcini, when she would ask for these contributions for various charities, would Mr. Keating agree to contribute?

MR. GROGAN: Mr. Keating would know if he said yes or no, but I do believe that we did contribute at times. I have no knowledge that it was ever related in any way to anything to deal with Senator DeConcini.

MR. BENNETT: But contributions were asked for and honored?

MR. GROGAN: That's correct.

MR. BENNETT: And what about the Kim Cranston situation? Are you talking about ones other than what you've already --

MR. GROGAN: No, sir.

MR. BENNETT: Okay. That's all I have, Senators.

SEN. HEFLIN: All right, sir, we'll stand in recess --

MR. : Mr. Chairman --

MR. : Mr. Chairman --

MR. BENNETT: I must have made a mistake.

MR. : Senator Helms.

SEN. HELMS: Mr. Chairman, pursuant to a letter that I wrote to you and the distingished Vice Chairman about three weeks ago -- I'm not going to be able to be here tomorrow. I consented for the committee to meet, and I believe that arrangements have been to Federal Express me perhaps a tape or certainly a transcript, is that correct?

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MR. : Both, if you'd like.

SEN. HELMS: Which I will review, and then we will decide about the future meetings this year of the committee, if any.

Let me say to Mr. Grogan that I've heard a lot of witnesses, but -- and you may have felt that I was stepping on you a little bit during your testimony, both yesterday and today --

Memorandum

To



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To :	SAC, PHOENIX (58C-PX-41605) (P) Date 7/3/91
From :	SA
Subject:	ALLEGATIONS CONCERNING UNITED STATES SENATORS ALAN CRANSTON, ET AL; CORRUPTION OF PUBLIC OFFICIALS - LEGISLATIVE; OO: PHOENIX OO: LOS ANGELES
November 3/14/90, line 11, his home \$31,000.0 approached at the reduced the concinudirect in It should	DENNIS DE CONCINI was first elected to the Senate in of 1977. He ran successfully for re-election in of 1982. DE CONCINI states in his deposition of before the SENATE SELECT COMMITTEE ON ETHICS, page 12, that KEATING contributed money to his campaign and used for a fund raiser. KEATING AND ASSOCIATES raised to for DE CONCINI's 1982 campaign. KEATING or ed DE CONCINI regarding the direct investment issue in the which DE CONCINI wrote a letter to Senator CRANSTON equest of AMERICAN CONTINENTAL CORPORATION (ACC). WI introduced an amendment in September of 1984 regarding exestment; however, the amendment was never brought up. In the be noted that KEATING bought LINCOLN SAVINGS AND LOAN February of 1984.
SELECT CO investment KEATING, HOME LOAN issue. It request It dated 11/ investment linked the recall if full supp	also wrote a letter to the FEDERAL N BANK BOARD (FHLBB) regarding the direct investment During the same time frame, KEATING and also DE CONCINI contact Senator JAKE GARN. GARN's affidavit /30/90, documents the DE CONCINI contact regarding direct at, but does not recall any information that would have ne telephone call to KEATING or LSL. GARN does not DE CONCINI asked him to contact (GARN was in port of and his policies).
2] - Phoen REB:jmd (2)	SFARCI D LIND D SCRIALL D E FILED DE SUR JUL 0 5 1991
	FBI — PHOENIX

During the period 7/31/85 to 8/15/85, KEATING AND ASSOCIATES contributed \$16,000.00 to DE CONCINI.

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In 1985, DE CONCINI states in his deposition that he contacted DON REGAN and regarding the incompetence of the FHLBB, and particularly The exact date is not established by the FBI investigation or by DE CONCINI's recollection in his deposition. DE CONCINI does not state that calls to REGAN and were at the direct request of KEATING. REGAN, during interview with the FBI, does not fix the date or the context of the contact by DE CONCINI. On 6/6/86, DE CONCINI writes a letter to DON REGAN, which is in support of for the nomination as a member of the FHLBB (bates #D000647, and follow up documents regarding are bates #000648 and #000649). It should be noted that bates #000649 is a document which appears to be supplied to DE CONCINI by KEATING, which states reasons to support and contains a biographical sketch of him. On 7/23/86, DE CONCINI pairs his vote with Senator GOLDWATER, after KEATING lobbied him to support Judge DAN MANION in order that the White House would support On 8/20/86, KEATING AND ASSOCIATES contributed \$10,000.00 to DE CONCINI. From 8/20/86 until 3/3/87, when DE CONCINI dines with there are frequent meetings between DE CONCINI, KEATING however, there is no evidence that DE CONCINI acted in any official capacity on behalf of KEATING during this time period. On 3/3/87, gives DE CONCINI \$9,750.00 in checks, political contributions collected in Arizona for contribution to Senator DON RIEGLE. The checks are conveyed to Senator DE CONCINI by a letter which identifies the contributors as employees of ACC and affiliated companies. It should be noted in his 10/26/90 deposition, page 47, line 5, discusses in detail his campaign activities on behalf of RIEGLE in Arizona. DE CONCINI's deposition, page 44, line 11, also discusses the RIEGLE collection agreement, and on page 45, line 19, DE CONCINI says he "handed those checks to RIEGLE". On 3/18/87, Senators DE CONCINI and RIEGLE meet regarding LSL, and

58C-PX-41605 REB:jmd at this time, RIEGLE suggests a meeting with DE CONCINI also states in his deposition that KEATING, during this time frame, also suggested the meeting. On 3/19/87, Senators DE CONCINI and MC CAIN met to discuss the LSL situation. Also present at this meeting was DE CONCINI staffer, On 3/19/87. writes a memo to DE CONCINI in which she states what ACC wants from and what ACC is willing to do (bates #D00661). On 3/24/87, KEATING and meet with DE CONCINI, and the discussion concerns the vendetta lawsuits and LSL issues. KEATING. at this time, is informed by DE CONCINI that a meeting with | was being set up (DE CONCINI deposition page 79, line 3). On 4/1/87, writes a memo to DE CONCINI stating what ACC would like and will do (bates #D00063). On 4/2/87, the meeting of the Senators with (DE CONCINI in his deposition believes, but does not have specific recollection, that he called KEATING after the 4/2/87 meeting concluded). On 4/3/87 calls DE CONCINI regarding the meeting with the FEDERL HOME LOAN BANK (FHLB) of San Francisco people. On 4/9/87, a meeting is held with the FHLB of San Francisco employees and "KEATING 5". On 4/9/87, DE CONCINI, in his deposition, states that he called KEATING after the 4/9/87 meeting; however, he does not mention the criminal referrals to KEATING. Following the 4/9/87 meeting, DE CONCINI has no official activity on behalf of KEATING. There are, however, final contributions of \$5,000.00 on 10/29/87, from in the amount of \$5,000.00. On 9/24/87, KEATING meets with DE CONCINI at his office. On page 213, line 16 of DE CONCINI's deposition, he recalls the meeting; however, he does not recall the details of the meeting, however, he is certain that he does not discuss "the criminality" or "any great details of the meeting that we had with the regulators". On 11/8/88, DE CONCINI is re-elected to the Senate. December of 1988, DE CONCINI receives a call from KEATING regarding the sale of LSL (page 216, line 12 and page 217, line 6). KEATING asked DE CONCINI to call to delay the audit

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report publication so not to jeopardize the potential sale. KEATING further urges DE CONCINI to ask WALL to approve the sale.

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In January of 1989, DE CONCINI calls and discusses the sale of LSL (page 218, line 9). DE CONCINI's recollection (page 223, line 5) is that he believes he also discussed the ROUSSELOT sale in January of 1989. DE CONCINI recalls KEATING, and EARL KATZ calling him regarding the ROUSSELOT sale.

In January of 1989, DE CONCINI also calls

a member of the FHLBB (page 226, line 5). During interview with
the FBI, believes that the call from DE CONCINI was in
late March or early April, 1989. DE CONCINI, in his deposition,
page 233, line 16, states that he discussed the LSL sale with
Senator CRANSTON prior to calling DE CONCINI
further states on page 238, line 20 that he talked to KEATING
before the call and, in fact, a call was also
suggested by KEATING.

On 4/7/89, DE CONCINI received a return telephone call from and during this call, DE CONCINI raises the issue of the LSL sale. recollection during his interview of 9/21/91 with the FBI states that DE CONCINI called him on 4/11/89, and asked to "promptly consider the pending sale of LSL." (DE CONCINI discusses his call with on page 245, line 17, as well as his discussion with KEATING).

During April of 1989, DE CONCINI calls

BUSINESS, TRANSPORTATION AND

HOUSING AGENCY, State of California, regarding his belief that
California was in a position to stop the sale of LSL to the
ROUSSELOT group. was interviewed on May 5, 1990, by
the FBI; however, he could not fix the date of this call in
April. DE CONCINI's deposition on page 239, line 20, is that he
only asked "if he objected to the sale". On page 245,
line 4, DE CONCINI discusses his call with with
KEATING.

On 4/14/89, makes a courtesy call to DE CONCINI to inform him that the FHLBB has seized LSL.

On 9/19/89, DE CONCINI states that he will return \$48,000.00 contributed to him by KEATING AND ASSOCIATES. (The actual amount was \$47,100.00, bates #D001162).

The things of value received by DE CONCINI from KEATING AND ASSOCIATES obviously were the campaign contributions; however, the official acts performed by DE CONCINI cannot be linked to these contributions.

Other things of value could be land and/or loans; however, none of these items can be attributed to monies from KEATING, his employees or affiliated companies in his deposition of 10/26/90, page 44, line 14, is asked about this area, and responds that to his knowledge, DE CONCINI and family members had no financial deals or relation with LSL, ACC or KEATING.
does, however, admit that he and KEATING have a business relationship (page 64, line 10). Is questioned about the DE CONCINI note to KEATING dated 12/18/84 (bates #D000621), where DE CONCINI writes a postscript, "Sorry we missed dinner. Thanks for helping I have no monetary interest, only my friendship for states he does not know what DE CONCINI had in mind. DE CONCINI, in his 3/14/90 deposition, page 26, line 20, discusses this note; however, DE CONCINI talks around the issues, and does not clearly say why he wrote the postscript note.
in his 10/26/90 deposition, identifies property and investments that he and DE CONCINI have joint interest in. however, states that no KEATING money is involved. DE CONCINI, in his deposition on page 253, line 5, denies any such interest as well. identifies the property as Pima/Bell Road property and Pinnacle Peak North property. on page 66, line 21, states that DE CONCINI knew nothing of his and KEATING's business dealings.
on page 43, line 5, of his deposition says he first told DE CONCINI about his business dealings with KEATING in early 1989. DE CONCINI in his deposition, page 28, line 6, states that and told him of their financial dealings with KEATING in December of 1988 or early 1989.
On 5/17/91, declined to be interviewed by the FBI. The interview had been arranged to be conducted in his attorney's office; however, upon arrival attorney indicated that he would not allow his client to be interviewed by the FBI, citing his abuse by the SENATE ETHICS COMMITTEE's council.
solicited charitable contributions from KEATING on two occasions. In November, 1985, she solicited \$50,000.00 for the PHOENIX MEMORIAL HOSPITAL INTERGENERATIONAL CHILD CARE CENTER, later known as "YOUNG COMPANY". In 1987 or 1988, she solicited money for a new gymnasium for the SETON CATHOLIC HIGH SCHOOL in Chandler,

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Arizona; however, KEATING told her that funds were not available
(see letter to dated 6/3/91). also
provided a list of other charities with which
has involvement. Review of documents available showing
contributions that KEATING and his affiliated companies made,
reveal that the only common charities that KEATING contributed
to, that had interest in, were the PHOENIX
MEMORIAL HOSPITAL and ST. MARY'S HIGH SCHOOL (or ST. MARY'S
CHURCH).

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KEATING contributed to PHOENIX MEMORIAL HOSPITAL as follows: In 1986, ACC contributed \$10,000.00 and LSL contributed \$57,500.00, and in 1987 ACC again contributed \$10,000.00.

In 1985, ACC contributed \$5,000.00 to ST. MARY'S and AMCOR contributed \$15,000.00 in 1986.

Investigation has not revealed any evidence that DE CONCINI promised any action for receipt of campaign contributions; no evidence of a quid pro quo.

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Memorandum



To : SAC, LOS ANGELES (58C-PX-41605)

Date

7/2/91

From :

SA

Subject:

ALAN CRANSTON;

ET AL;

00: Phoenix/Los Angeles

I. THE PATTERN OF KEATING CONTRIBUTIONS AND CRANSTON SERVICES

(SARA) (P)

A. OCTOBER, 1986 - DIRECT INVESTMENT LEGISLATION

THINGS OF VALUE RECEIVED BY PUBLIC OFFICIAL

CRANSTON sought re-election to the United States Senate on election day, 11/5/86. In 1985, KEATING and his associates contributed \$23,000 to CRANSTON's campaigns, and in early August, 1986, they contributed an additional \$11,000. On 10/8/86, AMERICAN CONTINENTAL CORPORATION (ACC) contributed \$35,000 to the California Democratic Party (CDP) Get-Out-The-Vote (GOTV) efforts, and on 10/14/86, ACC contributed an additional \$50,000. These contributions were solicited by CRANSTON and were primarily for his benefit. On approximately 10/17/86, CRANSTON's fund-raiser requested a \$300,000 line of credit from LINCOLN SAVINGS AND LOAN (LSL) for CRANSTON's campaign, and the unsecured line of credit was arranged within a week, although CRANSTON never drew on the line of credit.

OFFICIAL ACTS

On approximately 10/17/86, at ACC's request, CRANSTON and GLENN put an anonymous "hold" on the FSLIC recapitalization bill pending in the Senate, until Senator PROXMIRE agreed on 10/18/86 to drop a provision in the bill limiting direct investments. Sometime in September or October of 1986, CRANSTON asked PROXMIRE if there was some way to get KEATING's choice, confirmed by the Senate to the FHLBB before adjournment on 10/18/86.

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secret, and disclosure traveled from signature of to not ment	never of om Phoenical Contraction (Contraction)	occurre enix to loan do	credit li d. LSL p Los Ange cuments,	ine w paral eles was	as negal to o inst	btain (ructed	CRAN by	upon, ISTON's her su	public who
B. MARCH -	APRIL	, 1987	- LEGISLA	ATIVE	AND	REGULA	TOF	RY HELI	2

On 3/3/87, KEATING contributed \$100,000 of LSL funds to USA Votes, a partisan organization founded by CRANSTON for the purpose of raising funds for voter registration projects.

OFFICIAL ACTS

THINGS OF VALUE

On 3/18/87, LSL sued the FHLBB, challenging the FHLBB's authority to issue regulations limiting direct investments by state-chartered institutions such as LSL. Because of this lawsuit, Senator PROXMIRE proposed, on 3/25/87, an amendment to his FSLIC recapitalization bill that would have clarified FSLIC's authority to regulate direct investments of state-chartered institutions. On 3/26/87, CRANSTON demanded of PROXMIRE that this amendment be dropped, and PROXMIRE did so, but only after stating for the record that the amendment was unnecessary, because FSLIC already had such authority. On 3/27/86, CRANSTON's banking aide, submitted for publication to the Congressional Record a CRANSTON statement, written by LSL outside attorney | that disputed PROXMIRE's statement of FSLIC's authority. CRANSTON's statement was later cited in LSL's litigation with the FHLBB.

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On 4/2/87. CRANSTON and three other senators met with to discuss LSL's regulatory woes. One
Week later, on 4/9/87, four senators met with San Francisco bank regulators regarding LSL. CRANSTON briefly attended the meeting
and expressed agreement with the other senators' concerns.
<u>NEXUS</u>
CRANSTON's services on LSL's behalf occurred within 37 or fewer days after LSL's \$100,000 check to USA Votes was written.
wrote a "confidential" memorandum to CRANSTON dated 1/2/87, in which she said, "Now that we are back in the majority there are a number of individuals who have been very helpful to you who have cases or legislative matters pending with our office who will rightfully expect some kind of resolution." then listed five individuals, including KEATING, who she
said, "is continuing to have problems with the Bank Board and
C. NOVEMBER, 1987 - LEGISLATIVE AND REGULATORY HELP
THINGS OF VALUE

On 9/24/87, CRANSTON solicited KEATING to contribute \$250,000 to CRANSTON's voter registration projects and on 11/6/87, KEATING aide delivered to CRANSTON two ACC checks, one to USA Votes for \$25,000 and one to FORUM INSTITUTE for \$225,000. FORUM INSTITUTE was a tax-exempt organization revitalized by CRANSTON, and it provided substantially all of the funding for the tax-exempt ORGANIZING INSTITUTE, which was founded by in 1987, and for tax reasons, could not directly receive contributions until later.

OFFICIAL ACTS

Six days after receiving the \$250,000 on 11/12/87, CRANSTON telephoned and urged a quick resolution of the examination of LSL. On 5/1/87, the FEDERAL HOME LOAN BANK OF SAN FRANCISCO, which had conducted the LSL examinations, had recommended that LSL be placed in conservatorship, but the FHLBB had not yet acted on the recommendation.

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On 11/13/87, CRANSTON wrote a letter to Senator BENTSEN proposing that the Internal Revenue Code's definition of a thrift qualifying for favorable income tax treatment be amended, to permit institutions with substantial direct investments such as LSL to qualify. This apparently resulted from lobbying of CRANSTON's staff, and has stated that CRANSTON's office produced what was requested by him.
NEXUS
In a memo dated 9/6/87, wrote CRANSTON that a USA Votes fundraising meeting was scheduled for CRANSTON with KEATING on 9/24. She added, "I've attached an article from The Wall Street Journal which talks about the views of views that obviously are good news to
KEATING. You should ask KEATING for \$250,000."
In CRANSTON's letter to KEATING dated 10/6/87, CRANSTON confirmed KEATING's pledge to contribute \$250,000 to voter registration. In the letter's opening paragraph, CRANSTON wrote, "It was a pleasure to see youand to hear that your meeting with had gone so well."
D. <u>EARLY 1988 - REGULATORY INTERFERENCE</u>
THINGS OF VALUE
On 1/8/88, KEATING dined with ALAN CRANSTON, when solicited a contribution for tax-exempt, voter-registration group, The Center For Participation In Democracy (CPD). On 2/10/88, visited ACC in Phoenix, Arizona, and KEATING gave them two ACC checks, one payable to CPD for \$400,000 and one payable to FORUM INSTITUTE for \$100,000.
OFFICIAL ACTS
At the 1/8/88 dinner meeting, KEATING had asked CRANSTON to arrange a meeting for KEATING with On 1/20/88, CRANSTON called and suggested that meet with KEATING on 1/28/88, and did so. CRANSTON had another telephone conversation with on 4/21/88 regarding LSL, and CRANSTON's

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On 5/5/88, KEATING became dissatisfied with the FHLBB's demands in its settlement negotiations with LSL, so KEATING called CRANSTON and asked him to call The next day,
CRANSTON's aide telephoned top aides
and stated that CRANSTON was "very
concerned" about some specific FHLBB negotiating positions with LSL.
<u>NEXUS</u>
In memo to CRANSTON dated 1/18/88, she wrote that she was pleased that CRANSTON's dinner with KEATING (on 1/8) "went so well." added that KEATING had asked CRANSTON to arrange a meeting with because KEATING wanted to learn directly from why the LSL examination was still ongoing four months after said it would be concluded in two weeks. Thus, at the same 1/8 meeting where CRANSTON solicited contributions from KEATING, KEATING asked CRANSTON for a favor (arrange a meeting with and the favor was granted before KEATING made his \$500,000 contribution.
E. <u>EARLY 1989 - ATTEMPTED SALE OF LSL</u>
THINGS OF VALUE
In approximately February, 1989, KEATING pledged an additional \$100,000 for CRANSTON's voter registration groups, but KEATING postponed payment until after LSL was sold, so the \$100,000 was never contributed. On 1/10/89, ACC contributed \$10,000 to CRANSTON's PAC, Committee for a Democratic Consensus, in connection with a Super Bowl event.
OFFICIAL ACTS
In early 1989, KEATING tried several times to sell LSL, but the FHLBB would not approve the sales, and the FHLBB eventually seized LSL on 4/14/89.
CRANSTON and met with KEATING and 2/7/89. On 2/8/89, telephoned FHLBB regulator demanding to know why the LSL sale had not yet been approved. CRANSTON called and FDIC head WILLIAM SEIDMAN the

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same day regarding the LSL sale. On 4/12/89, CRANSTON called both and FHLBB member and urged consideration of JOHN ROUSSELOT's offer to buy LSL. On 4/13/89, CRANSTON urged the third FHLBB member to hear prospective LSL buyer ROUSSELOT's offer and to consider the effect of ACC's bankruptcy on California, Arizona, and the FSLIC. After the FHLBB seized LSL on 4/14/89, CRANSTON tells that the FHLBB made a serious mistake.
<u>NEXUS</u>
On 12/14/88, KEATING met CRANSTON and in Los Angeles for dinner, and CRANSTON greeted KEATING by characterizing the dinner as a meeting of the mutual aid society.
II. ADDITIONAL EVIDENCE OF CRIMINAL INTENT
A. CRANSTON'S STATE OF MIND
On 12/14/88, according to CRANSTON referred to his meeting with KEATING as the mutual aid society.
In his Senate Select Committee on Ethics deposition on 4/30/90, CRANSTON explained that a contributor has "a better chance to get access" than a noncontributor (page 219). In a telephone interview with reporter MARK STERN on 10/2/89, CRANSTON explained that there never should be a "quid pro quo to a contribution," and "the most" a contribution "is supposed to and expected to get somebody is access if they have a problem." CRANSTON added that a supporter has "a right to present a case to you and any constituent has except you can't see every constituent. So access goes to those who have been helpful" (Transcript is CRANSTON document #80000040.) In his Ethics Committee deposition (at page 341), CRANSTON conceded that KEATING had "almost total access" to CRANSTON and his staff.
CRANSTON commonly had his fundraiser, present for meetings with KEATING and other businessmen seeking CRANSTON's services. According to

В.	KEATING'S AND		STATE OF M	<u>[ND</u>		
ques way	lay following A tionhad to influenced sev to say in the	ACC's bank o do with veral poli	whether my itical figur	ing, KEATIN financial res to take	IG said, "O support in up my cau	ne any se. I
but with	STON's office <u>fe</u> lt th	never cor at the AC gained sp	CC contribut pecial acces	ervices on tions devel ss to CRANS	oped goodw TON, acces	ons, ill
c.	HISTORY OF CRA	NSTON'S I	POSITION ON	DIRECT INV	'ESTMENTS	
adorument de la composición del composición de la composición del composición de la	In July, test) to set of the property of the comment property of the property of the comment property of the comment property of the comment of the comm	coposed red affects deration of lated 12/1 stantive particular attorney, attorney, and direct on 1/31 period on lays to 90 to may three may three	egulation lined institution of this sub- l3/84, she sposition on appropriate /lobbyist investment l/85, CRANST the direct of days. In the FHLBB's eaten the FS	sting that imiting dirions have he direct." In stated that direct investment on this letter concerns the stated that investment this letter concerns the stated that the state	deferrect investrad an opportunity of the control o	ments rtunity has but view to sting on be N said ricted onable

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Thus, CRANSTON's opposition to direct investment limitations developed after 1/31/85, about the same time he was establishing a relationship with ACC/LSL and other similarly minded institutions.

contribution.

D. <u>USA VOTES FUNDED SOME OF CRANSTON'S TRAVEL AND MEAL EXPENSES</u>

In 1987, LSL/ACC contributed \$125,000 to USA Votes, CRANSTON's partisan organization designed to raise funds for voter registration groups. This was a sizable contribution in that USA Votes' 1987 expenditures were only \$190,000. USA Votes reimbursed CRANSTON for his fundraising expenses, which totalled \$16,472.98 (according to USA Votes) in travel, lodging, and meals from 5/5/87 through 10/14/88. In addition, USA Votes reimbursed for some of his expenses in attending the Democratic Party's National Convention in 1988, totalling \$612.33.

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III. EVIDENCE CRANSTON's fundraiser (not a government employee) was involved in raising \$850,000 in voter registration funds from KEATING and arranging the 1986 line of credit from According to she frequently discussed substantive issues with him, including occasions when she was soliciting funds from him. By her own admission, relayed substantive concerns from to CRANSTON or In her memo to CRANSTON dated 1/2/87, she suggested that KEATING and others should be helped by CRANSTON's office because they had been helpful to CRANSTON. However, did not directly benefit personally by raising funds from KEATING, because she was paid a flat monthly amount for her fundraising and did not receive any commissions. CRANSTON's former Southern California Finance Chair has implicated lin arranging in 1988 an illegal transfer of \$4,000 from CRANSTON's political action committee to CRANSTON's 1984 presidential campaign through political action committee. Federal Election Commission records shows that PACIFIC PAC contributed \$4,000 to CRANSTON's 1984 presidential campaign on 1/27/88. Three days later, on 1/30/88, CRANSTON's Committee for a Democratic Consensus contributed \$5,000 to PACIFIC PAC. allegation is supported by the record of nearly simultaneous transfers among the three entities. However, in memo to CRANSTON dated 1/18/88, she informed CRANSTON that "over the holiday" had agreed to have his PAC give \$4,000 to the presidential campaign "to cover the money that [campaign treasurer] needs in January". In her memo asked CRANSTON to write dated 2/22/88, handwritten note thanking him for the \$4,000 contribution from his PAC to the presidential campaign. In neither memo did mention that PAC was reimbursed for its

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No other conduit contribution to CRANSTON's presidential campaign is apparent from a review of Federal Election Commission records. In fact, in 1987-1988, CRANSTON's presidential campaign received only \$10,900 in contributions from political action committees, of which \$4,000 came from PACIFIC PAC. Other than PACIFIC PAC, none of the other PAC contributors received contributions from CRANSTON's PAC in 1987-1988.

V. ADDITIONAL INVESTIGATION CONTEMPLATED

- A. Attempt to identify and interview the California Democratic Party (CDP) Official who is familiar with ACC's 1986 contribution to the CDP.
- B. Interview Senator BYRD's floor staff members who may be knowledgeable about the hold(s) on PROXMIRE's 1986 FSLIC recapitalization bill.
- C. Interview former LSL employee circumstances of the 1986 LSL line or credit to CRANSTON, and the reason for the secrecy surrounding it.
- D. Re-interview
- E. Interview GLENN regarding his "hold" on PROXMIRE's 1986 direct investment legislation, to determine if he was aware of CRANSTON's involvement.
- F. Interview CRANSTON.
- G. Interview and CHARLES KEATING, if and when they become available.
- H. Consider locating other individuals who may have solicited CRANSTON's services in connection with contributions, such as:
- 1. E. GALLO, Modesto, California contributed \$200,000 to CRANSTON's voter registration project in 1987 1988.

2. may have interceded with connection with	Los Angeles California - CRANSTON in 1988 in attempt to acquire TAHOE SAVINGS.
mentioned on	all 72/87 list of individuals who have been

helpful and who rightfully expect resolution of their problems.

I. Interview CRANSTON's regarding the LSL line of credit and the \$85,000 contribution to the California Democratic Party.

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Memorandum



To : SAC, LOS ANGELES (58C-PX-41605) (SARA-9) (P7)/5/91
From : SA
Subject: U.S. SENATOR ALAN CRANSTON, ET AL; CORRUPTION OF PUBLIC OFFICIALS; OO: PHOENIX/LOS ANGELES
This memo summarizes the evidence as it relates to Senator DONALD RIEGLE.
I. BRIBERY/GRATUITY
A. THINGS OF VALUE RECEIVED BY PUBLIC OFFICIAL
On 3/1/86, RIEGLE attended the opening of ACC'S HOTEL PONTCHARTRAIN in Detroit, Michigan. ACC paid round-trip travel expenses for RIEGLE from Washington to Detroit.
On 1/28/87, KEATING offered to organize a fund raising event for RIEGLE at the HOTEL PONTCHARTRAIN with a goal of raising at least \$100,000. The fund raising luncheon was held or 3/23/87, and \$95,150 was contributed to RIEGLE, of which \$78,250 was contributed by individuals affiliated with KEATING as family, employees, or spouses of employees.
On 2/22/88, offered to sponsor another fund raising event for RIEGLE to be held in New York on May 10 or 11, with the goal of raising \$100,000. This event was never held, and no ACC/LSL affiliated contributions were made to RIEGLE after March of 1987.
B. OFFICIAL ACTS
RIEGLE attended a meeting on 4/9/87 in Washington with the San Francisco regulators, along with three other senators. The senators were interceding on behalf of LINCOLN SAVINGS, and this meeting followed a 4/2/87 meeting the senators had with RIEGLE did not attend the 4/2/87 meeting
and he claims he had no prior knowledge of the meeting. However, RIEGLE probably helped arrange the meeting with and RIEGLE has admitted he suggested to in March of 1987 that meet with the Arizona senators regarding LINCOLN SAVINGS.
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C. <u>NEXUS BETWEEN OFFICIAL ACTS AND THINGS OF VALUE RECEIVED</u> <u>BY PUBLIC OFFICIAL.</u>

RIEGLE attended the 4/9/87 meeting with the San Francisco regulators only 17 days after the \$95,150 fund raising luncheon.

II. PERJURY

A. RIEGLE'S STATEMENTS UNDER OATH

In his testimony before the Senate Ethics Committee, RIEGLE testified that he returned approximately \$78,000 in campaign contributions to KEATING affiliated contributors only after learning from the DETROIT NEWS on 2/28/88 that \$66,000 of the HOTEL PONTCHARTRAIN fund raising event proceeds came from KEATING affiliated individuals. RIEGLE explained that this created an appearance of conflict of interest, because the funds were received close in time to the 4/9/87 meeting with regulators attended by RIEGLE.

On 10/17/90, testifying before an executive session of the Ethics Committee, RIEGLE stated that until the DETROIT NEWS story was published nearly a year after the HOTEL PONTCHARTRAIN event, which revealed that \$66,000 of the proceeds came from individuals with "apparent direct business connections to KEATING", RIEGLE had "no prior knowledge of this pattern of contributions" (page 37). RIEGLE testified he asked his staff to immediately check the story's accuracy, because he had "real doubts" that it was accurate. RIEGLE said he initially thought the story was "maybe a hatchet job and untrue" (page 38).

On 1/7/91, in his public testimony before the Ethics Committee, RIEGLE repeated that when he first saw the DETROIT NEWS article about the \$66,000, "I didn't believe it because that was nothing that I knew or was aware of or had imagined" (page 81). RIEGLE said he then learned that \$78,000 had been given by 78 individuals who had listed 13 different business affiliations, but who were affiliated with KEATING, and "That is the first I knew of that" (page 81). RIEGLE explained he was troubled about this and the proximity to his attendance at the April 9 meeting, so he refunded the contributions.

Again on 1/7/91, RIEGLE testified he was "uncomfortable about the appearance of the bundling of all of those contributions, which I had not known about until that story ran" and his attendance at the April 9 meeting (pages 110-111).

On 1/8/91, RIEGLE testified that, after the DETROIT NEWS story ran a year after the fund raising event, "I found out for the first time that the bulk of those contributions had not come from my own contributors where we had sent the contributor list out there, and I thought that is where the bulk of the effort was going to be directed" (page 152). RIEGLE was referring to a list of approximately 400 Michigan residents who had previously contributed at least \$500 to RIEGLE, which list was provided by RIEGLE'S staff to KEATING as prospective contributors to the HOTEL PONTCHARTRAIN event. With regard to RIEGLE refunding the KEATING-affiliated contributions, Senator LOTT asked RIEGLE if he recognized there was an appearance of conflict in "hindsight", and RIEGLE responded, "Yes, it was hindsight...But when I saw it, I acted on it."

B. EVIDENCE OF RIEGLE'S CONTEMPORANEOUS KNOWLEDGE OF THE CONTRIBUTORS AFFILIATION WITH KEATING

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In February 1987, three separate bundles of checks from
KEATING affiliated individuals payable to RIEGLE were collected
by an ACC secretary and forwarded to <u>a fund-raiser</u> for
DECONCINI. With a cover letter dated 3/3/87, forwarded an
unspecified number of checks to DECONCINI, for delivery to
RIEGLEnoted in his letter that the checks were raised by
KEATING. DECONCINI testified before the Ethics Committee that he
personally physically gave to RIEGLE the checks DECONCINI
received from (1/1/91 testimony at page 192). In all
likelihood, DECONCINI gave RIEGLE all three bundles of checks
had obtained from ACC in February, because RIEGLE'S FEC
report shows that all these checks in the three bundles were
received by RIEGLE'S campaign on 3/12/87. Checks from KEATING'S
family and employees in the three bundles totalled \$28,750.

RIEGLE'S FEC report shows receipt of \$21,500 in checks from KEATING, his family and employees on 3/11/87. Although additional investigation is necessary to substantiate this, these checks probably were handed to RIEGLE when RIEGLE and his aide

<u>-</u>
visited the ACC offices in Phoenix on 3/9/87, and flew back to Washington that afternoon with
Thus, RIEGLE apparently had in his hands in March, 1987, checks totalling \$71,250 from individuals affiliated with KEATING, specifically the \$21,000 RIEGLE gave on March 23 or 24, the \$28,750 DECONCINI gave RIEGLE on approximately March 12, and the \$21,500 RIEGLE probably picked up in Phoenix on March 9. If RIEGLE looked at the checks, he would have noticed the Arizona address% rather than Michigan.
Furthermore, in her interview, said it was common in the RIEGLE campaign to receive contributions from family and employees of the host of a fund raising event. estimated that 75% of contributions from hosted events came from the host's family and employees. Evidence that RIEGLE was aware of this routine practice would have to be developed.
RIEGLE'S implication that the contributors could not be identified as KEATING employees because they listed 13 different business affiliations is specious. A review of RIEGLE'S FEC report for March 1987 shows contributions of \$38, 500 from 35 individuals employed by AMERICAN CONTINENTAL CORPORATION or other companies where the first two words of their names were "AMERICAN CONTINENTAL" (such as AMERICAN CONTINENTAL PROPERTIES), \$10,750 from 14 individuals employed by LINCOLN SAVINGS AND LOAN or LINCOLN SAVINGS AGENCY, \$2,000 from one individual employed by HOTEL PONTCHARTRAIN, and \$11,500 from eight individuals clearly identifiable as spouses of ACC/LSL employees, for a total of \$62,750. All these individuals had Arizona addresses, except for a few LINCOLN SAVINGS employees residing in California.
C. EVIDENCE SUPPORTING RIEGLE'S IGNORANCE
stated in his FBI interview on 6/20/90, that knowledge of the degree of KEATING affiliated contributions, which lead to RIEGLE'S decision to refund the KEATING affiliated contributions, came from the Detroit Newspaper story. in an affidavit submitted to the Ethics Committee, stated she was with RIEGLE in Detroit on 2/28/88 when RIEGLE read the DETROIT NEWS article in disbelief.

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REVIEW OF DEPOSITION OF DENNIS DE CONCINI BEFORE THE UNITED STATES SENATE SELECT COMMITTEE ON ETHICS WASHINGTON, D.C. MARCH 14, 1990

Page 11	Line 12	KEATING advised LSL of DE CONCINI's conversation with KEATING change after this date.
Page 12	Line 11	1982 fund raiser held at KEATING's residence.
Page 13	Line 6	Direct investment discussion.
Page 15	Line 16	KEATING comes to DE CONCINI office within July of 1985.
Page 16	Line 8	DE CONCINI writes to regarding direct investments.
Page 25	Line 14	DE CONCINI contacts Senator GARN at KEATING request.
Page 26	Line 6	DE CONCINI contacts GARN at KEATING request.
Page 26	Line 20	DE CONCINI note to KEATING where he attaches postscript thanking KEATING for his help of
Page 28	Line 6	deals with KEATING were disclosed by them to DE CONCINI in December of 1988 or early 1989.
Page 28	Line 13	is identified by DE CONCINI as the individual who asked DE CONCINI to call GARN.
Page 31	Line 8	DE CONCINI calls and don REGAN.
Page 35	Line 12	DE CONCINI knew that KEATING and his associates had contributed money to his campaign.

Page 40	Line 12	DE CONCINI states he did nothing for KEATING because of the money given to him.
Page 41	Line 8	DE CONCINI discusses the KEATING statement of 4/17/89 regarding political influence.
Pagė 44	Line 11	DE CONCINI/DON RIEGLE collection agreement.
Page 45	Line 19	DE CONCINI does not recall talking to RIEGLE about KEATING contributions, but states "handed those checks to RIEGLE."
Page 53	Line 13	KEATING informed DE CONCINI of Senators' identities who were interested in the 4/2/87 meeting.
Page 59	Line 9	DE CONCINI/MC CAIN meet on 3/19/87.
Page 64	Line 21	DE CONCINI called to set up 4/2/87 meeting.
Page 65	Line 21	Someone from KEATING GROUP told DE CONCINI that MC CAIN was interested in the LSL problem.
Page 66	Line 10	RIEGLE suggests meeting with
Page 69	Line 20	DE CONCINI did tell MC CAIN that he would negotiate on behalf of KEATING.
Page 70	Line 19	DE CONCINI had discussion with MC CAIN that LSL would do something for something in return from the FHLBB.
Page 72	Line 8	DE CONCINI told MC CAIN that RIEGLE suggested the 4/2/87 meeting.
Page 73	Line 19	RIEGLE suggests meeting.
Page 74	Line 5	KEATING calls DE CONCINI on 3/17/87 suggesting the meeting.

Page 75	Line 14	CRANSTON was aware of meeting.
Page 79	Line 3	3/24/87 meeting with KEATING.
Page 80	Line 5	DE CONCINI may have told KEATING meeting with was set or was in the works. KEATING reaffirmed which senators would attend.
Page 80	Line 13	3/24/87 DE CONCINI first learned which senators would attend the 4/2/87 meeting.
Page 81	Line 15	KEATING would make concessions.
Page 98	Line 6	KEATING was who called about meeting with \square
Page 98	Line 13	DE CONCINI talks to RIEGLE regarding the 4/2/87 meeting on 3/17/87.
Page 127	Line 16	DE CONCINI discusses the "quid pro quo" as it relates to assertion that it was offered on 4/2/87.
Page 163	Line 8	DE CONCINI was called by on 4/3/87.
Page 176	Line 18	RIEGLE suggests meeting DE CONCINI, as did KEATING.
Page 190	Line 20	DE CONCINI called KEATING after 4/2/87 meeting.
Page 191	Line 19	DE CONCINI called KEATING after the 4/19/87 meeting.
Page 199	Line 21	DE CONCINI, after the 4/9/87 meeting, did nothing for KEATING until the sale of LSL.
Page 213	Line 1	DE CONCINI calls KEATING after the 4/9/87 meeting.
Page 213	Line 16	DE CONCINI and KEATING meet 9/24/87.
Page 216	Line 21	DE CONCINI answers questions regarding LSL sale calls.

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Page 217	Line 16	DE CONCINI answers questions regarding LSL sale calls.
Page 223	Line 6	DE CONCINI calls re second LSL sale.
Page 226	Line 5	DE CONCINI calls
Page 229	Line 12	DE CONCINI's call to
Page 233	Line 16	DE CONCINI and CRANSTON talk regarding LSL sale.
Page 234	Line 21	DE CONCINI and CRANSTON discuss <u>sale of LSL be</u> fore calls to
Page 238	Line 20	DE CONCINI talks with KEATING before calls.
Page 239	Line 19	DE CONCINI calls
Page 243	Line 1	DE CONCINI denies trying to muzzle
Page 244	Line 7	2/7/89 meeting in DE CONCINI's office re LSL sale.
Page 245	Line 4	DE CONCINI calls KEATING re calls to California regulators.
Page 245	Line 17	DE CONCINI tells KEATING about wall calls.
Page 245	Line 22	DE CONCINI calls re LSL sale.
Page 249	Line 7	DE CONCINI had no contact with regulators for 20 months after the 4/7/87 meeting.
Page 251	Line 8	DE CONCINI discusses the Iran Contra vote trade regarding
Page 252	Line 14	DE CONCINI didn't know had financial ties with KEATING when he was actively supporting for nomination to the FEDERAL HOME LOAN BANK BOARD (FHLBB).

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Page 253	Line 2	DE CONCINI says he has no financial interest in any KEATING company; however, he qualifies that on one occasion he did have a certificate of deposit at LSL.
Page 255	Line 7	DE CONCINI states that informed him of their business relationship with KEATING in either December, 1988 or early 1989.
Page 257	Line 3	DE CONCINI discloses he has interest in Pinnacle Peak.
Page 257	Line 12	DE CONCINI again discusses the "thanks for helping postscript notation on his 12/18/84 letter to KEATING.
Page 266	Line 11	DE CONCINI does not believe that KEATING dealt straight with him.

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DENNIS DE CONCINI TIME LINE

1982	KEATING has fund raiser at his home for DE CONCINI, raising \$31,000.00.
.6/6/84	KEATING and DE CONCINI meet.
9/12/84	meets with DE CONCINI.
10/15/84	DE CONCINI dines with KEATING.
1/29/85	KEATING meets with DE CONCINI.
4/2/85	KEATING dines with DE CONCINI.
7/10/85	KEATING, meet with DE CONCINI.
7/31 - 8/15/85	KEATING AND ASSOCIATES contribute \$16,000.00 to DE CONCINI.
3/26/86	KEATING, meet with DE CONCINI.
6/6/86	DE CONCINI writes to DON REGAN (White House Chief of Staff) and recommends for FEDERAL HOME LOAN BANK BOARD (FHLBB) position.
7/7/86	KEATING and DE CONCINI dine at ACC, Phoenix.
7/23/86	DE CONCINI pairs vote with Senator BARRY GOLDWATER after KEATING lobbies him to support Judge DAN MANION, so White House would support (confirmation of MANION defeated in the Senate in a tie vote). Review of the Congressional Quarterly revealed that on 7/23/84, DE CONCINI and GOLDWATER did, in fact, pair their vote. GLENN, bates number G001589, shows request of GLENN to vote for MANION. 302 dated 10/10-11/90, confirms this request. DE CONCINI letter to DON REGAN is DE CONCINI bates number D000647, and REGAN's acknowledgment is bates number D000648.
8/20/86	KEATING AND ASSOCIATES contribute \$10,000.00 to DE CONCINI.
9/16/86	meets with DE CONCINI.
1/8/87	meets with DE CONCINI (not confirmed).
1/27/87	KEATING and meet with DE CONCINI.
1/28/87	KEATING and meet with DE CONCINI.
3/3/87	DE CONCINI dines with FHLBB.

FHLBB's decision to seize LSL.

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9/18/89 DE CONCINI says he will return \$48,000.00 from KEATING AND ASSOCIATES.

9/19/89 DE CONCINI returns \$47,100.00 to KEATING AND ASSOCIATES (DE CONCINI bates number D001169).

11/27/89 DE CONCINI confirms return of KEATING AND ASSOCIATES' contribution to the FEDERAL ELECTION COMMISSION (FEC) (DE CONCINI bates number D001162).

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FBI DALLAS/ROUTINE/

FBI NEW YORK/ROUTINE/

FBI SAN FRANCISCO/ROUTINE/

FBI SPRINGFIELD/ROUTINE/

FBI WMFO/ROUTINE/

INFO DIRECTOR FBI/ROUTINE/

FBI PHOENIX/ROUTINE/

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SECTION ONE OF THREE SECTIONS

CITE: //3410:0670//

PASS: FBIHQ PUBLIC CORRUPTION UNIT.

SUBJECT: ALLEGATIONS CONCERNING U.S. SENATORS ALAN CRANSTON,

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DENNIS DECONCINI, JOHN GLENN, JOHN MCCAIN, DONALD RIEGLE;
CHARLES H. KEATING, JR., DBA LINCOLN SAVINGS AND LOAN
ASSOCIATION, IRVINE, CALIFORNIA, AND AMERICAN CONTINENTAL
CORPORATION, PHOENIX, ARIZONA; CORRUPTION OF FEDERAL PUBLIC
OFFICIALS - LEGISLATIVE; OO: PX/LA.

ENCLOSED BY SEPARATE FAX ARE: FOR DALLAS, LETTER DATED
2/5/88 TO FROM CRANSTON, AND MEMORANDUM DATED
12/20/88 TO CRANSTON FROM REGARDING
FOR NEW YORK, TWO LETTERS DATED 3/2/88 AND 5/9/88 FROM
CRANSTON TO FOR SPRINGFIELD, A LETTER DATED
5/4/88 TO FROM CRANSTON AND A FORBES MAGAZINE ARTICL ENTITLED "POLITICAL GREENMAIL" FROM PAGE 72 OF 5/27/91 ISSUE.
FOR WMFO, MEMO TO CRANSTON DATED 1/2/87.

THIS INVESTIGATION INVOLVES WELL-PUBLICIZED ALLEGATIONS
THAT CAPTIONED U.S. SENATORS INTERCEDED ON SUBJECT CHARLES H.
KEATING'S BEHALF WITH FEDERAL HOME LOAN BANK BOARD (FHLBB)
REGULATORS, IN EXCHANGE FOR CONTRIBUTIONS TO THE SENATORS'
CAMPAIGNS, POLITICAL ACTION COMMITTEES, AND CRANSTON'S VOTER
REGISTRATION GROUPS. THE ALLEGED INTERFERENCE WAS ON BEHALF
OF TROUBLED LINCOLN SAVINGS AND LOAN ASSOCIATION (LSL), WHICH
WAS ULTIMATELY PLACED IN CONSERVATORSHIP BY THE FHLBB ON

ь6 ь7с 4/14/89. INVESTIGATION HAS FOCUSED ON SENATOR CRANSTON, AND THE PATTERN OF SERVICES PERFORMED BY CRANSTON FOR KEATING CLOSE IN TIME TO KEATING CONTRIBUTIONS TO CRANSTON ORGANIZATIONS.

AMERICAN CONTINENTAL CORPORATION (ACC) AND ITS SUBSIDIARY LSL CONTRIBUTED A TOTAL OF \$850,000 IN 1987-1988 TO "SOFT-MONEY" VOTER REGISTRATION GROUPS AFFILIATED WITH CRANSTON. DECEMBER 1985, CRANSTON ASKED TO ORGANIZE AMERICAVOTES (LATER KNOWN AS USA VOTES), A PARTISAN GROUP CONTROLLED BY CRANSTON DESIGNED TO RAISE FUNDS FOR NON-PARTISAN VOTER REGISTRATION GROUPS. CREATED A FOR-PROFIT CORPORATION KNOWN AS NEW DIMENSION RESOURCES TO MANAGE AMERICAVOTES. BEGINNING IN 1986, CRANSTON SOLICITED NON-DEDUCTIBLE CONTRIBUTIONS TO AMERICAVOTES TO COVER THE FUND RAISING OVERHEAD. UNDER THE AUSPICES OF USA VOTES, CRANSTON THEN RAISED TAX-DEDUCTIBLE MONEY FOR VOTER REGISTRATION GROUPS, IN PARTICULAR, A GROUP FOUNDED BY KNOWN AS THE FORUM INSTITUTE, AND CITIZENS PARTICIPATION PROJECT: THE MISSING HALF. USA VOTES, AND FORUM INSTITUTE WERE BASED IN WASHINGTON, D.C. AFTER

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The state of the s
CRANSTON'S SUCCESSFUL RE-ELECTION CAMPAIGN IN 1986,
FOUNDED IN 1987 THE ORGANIZING
INSTITUTE (OI) AND THE CENTER FOR PARTICIPATION IN DEMOCRACY
(CPD), CALIFORNIA-BASED, TAX-EXEMPT, VOTER REGISTRATION GROUPS
THAT PURPORTED TO BE NON-PARTISAN.
THE GET-OUT-THE-VOTE (GOTV) IN
CRANSTON'S 1986 CAMPAIGN. FORUM INSTITUTE PROVIDED ALMOST ALL
OF THE FUNDING FOR OI. RAISED MOST OF THE FINANCING
FOR CPD, WHICH BEGAN RECEIVING CONTRIBUTIONS IN SEPTEMBER 1987
AFTER IT OBTAINED ITS TAX-EXEMPT STATUS FROM THE INTERNAL
REVENUE SERVICE. HIRED PROFESSIONAL FUND
RAISERS TO ASSIST IN THE FUND RAISING. AND
WERE PROFESSIONAL FUND RAISERS FOR FORUM
INSTITUTE AND USA VOTES. CPD RETAINED PROFESSIONAL FUND
RAISER OF SAN FRANCISCO TO HELP RAISE FUNDS.
IN ADDITION TO THE VOTER REGISTRATION GROUPS, CRANSTON
MAINTAINED TWO SEPARATE CAMPAIGN ORGANIZATIONS AND A POLITICAL
ACTION COMMITTEE. THE CAMPAIGN ORGANIZATIONS WERE ONE FOR HIS
SENATORIAL CAMPAIGN AND ONE FOR HIS 1984 PRESIDENTIAL

CAMPAIGN. CRANSTON'S POLITICAL ACTION COMMITTEE WAS KNOWN AS

THE COMMITTEE FOR A DEMOCRATIC CONSENSUS (CDC). FOR SEVERAL

YEARS IN THE LATE 1980'S, CRANSTON SPONSORED A FUND RAISING EVENT IN CONNECTION WITH THE SUPERBOWL, WHICH RAISED MONEY FOR THESE THREE ENTITIES. IN ADDITION, IN 1986, CRANSTON R "SOFT-MONEY" FOR THE CALIFORNIA DEMOCRATIC PARTY, WHICH ASSISTED HIS 1986 CAMPAIGN. SOFT-MONEY MEANS CONTRIBUTIONS NOT REGULATED BY THE FEDERAL ELECTION LAW, AND THEREFORE SOFT-MONEY CAN BE CONTRIBUTED BY CORPORATIONS IN UNLIMITED AMOUNTS. WAS ALSO A FUND RAISER FOR CRANSTON'S CAMPAIGNS, CDC, AND THE DEMOCRATIC SENATORIAL CAMPAIGN COMMITTEE (DSCC). SOLICITED KEATING FOR SEVERAL CONTRIBUTIONS, AND KEATING ALWAYS OBLIGED. IN 1985, KEATING RAISED \$23,000 FOR CRANSTON'S CAMPAIGNS, AND IN 8/86, KEATING RAISED AN ADDITIONAL \$0. IN 10/86, AT CRANSTON'S REQUEST, ACC CONTRIBUTED \$85,000 TO THE CALIFORNIA DEMOCRATIC PARTY. IN 10/86, LSL ARRANGED A \$300,000 LINE OF CREDIT FOR CRANSTON FOR HIS CAMPAIGN, AT REQUEST. ON 3/3/87, KEATING CONTRIBUTED \$100,000 OF LSL FUNDS TO USA VOTES. 11/6/87, KEATING AIDE DELIVERED TO CRANSTON TWO

ACC CHECKS, ONE TO USA VOTES FOR \$25,000 AND ONE TO FORUM

INSTITUTE FOR \$225,000. ON 2/10/88,

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VISITED ACC

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IN PHOENIX, ARIZONA, AND KEATING GAVE THEM TWO ACC CHECKS, ONE PAYABLE TO CPD FOR \$400,000 AND ONE PAYABLE TO FORUM INSTITUTE FOR \$100,000. IN APPROXIMATELY 2/89, KEATING PLEDGED AN ADDITIONAL \$100,000 FOR CRANSTON'S VOTER REGISTRATION GROUPS, BUT THE \$100,000 WAS NEVER CONTRIBUTED. ON 1/10/89, ACC CONTRIBUTED \$10,000 TO CDC IN CONNECTION WITH THE SUPERBOWL EVENT. DURING THE SAME TIME PERIOD, CRANSTON ASSISTED ACC/LSL ON SEVERAL LEGISLATIVE AND REGULATORY MATTERS. IN 10/86, CRANSTON EFFECTIVELY FORCED THE U.S. SENATE FLOOR MANAGERS TO DROP A PROVISION FROM A BILL, WHICH PROVISION WOULD HAVE LIMITED DIRECT INVESTMENTS BY FEDERALLY INSURED INSTITUTIONS SUCH AS LSL. IN 3/87, CRANSTON SUCCEEDED IN CONVINCING SENATOR WILLIAM PROXMIRE TO DROP A LEGISLATIVE PROVISION THAT WOULD HAVE ADVERSELY AFFECTED LSL. IN 3/86, CRANSTON'S

SUBMITTED FOR PUBLICATION TO THE

CONGRESSIONAL RECORD A STATEMENT ATTRIBUTED TO CRANSTON BUT WRITTEN BY AN LSL ATTORNEY THAT LATER ASSISTED LSL IN ITS LITIGATION WITH THE FHLBB. IN 4/87, CRANSTON AND THREE OTHER BT

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FM FBI LOS ANGELES (58C-PX-41605) (SARA) (P)

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FBI NEW YORK/ROUTINE/

FBI SAN FRANCISCO/ROUTINE/

FBI SPRINGFIELD/ROUTINE/

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FBI PHOENIX/ROUTINE/

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SECTION TWO OF THREE SECTIONS

CITE: //3410:0670//

PASS: FBIHQ PUBLIC CORRUPTION UNIT.

SUBJECT: ALLEGATIONS CONCERNING U.S. SENATORS ALAN CRANSTON,

PAGE TWO DE FBILA 0003 UNCLAS

DENNIS DECONCINI, JOHN GLENN, JOHN MCCAIN, DONALD RIEGLE;
CHARLES H. KEATING, JR., DBA LINCOLN SAVINGS AND LOAN
ASSOCIATION, IRVINE, CALIFORNIA, AND AMERICAN CONTINENTAL
CORPORATION, PHOENIX, ARIZONA; CORRUPTION OF FEDERAL PUBLIC
OFFICIALS - LEGISLATIVE; OO: PX/LA.

TEXT CONTINUES: SENATORS MET WITH REGARDING LSL. IN 1987 THROUGH 1989, CRANSTON MADE SEVERAL TELEPHONE CALLS TO URGING THE QUICK RESOLUTION OF THE FHLBB EXAMINATION OF LSL, AND LATER URGING SERIOUS .. CONSIDERATION OF A PROPOSED SALE OF LSL. CRANSTON ALSO ARRANGED AT LEAST ONE MEETING WITH WALL FOR KEATING. ALTHOUGH THERE IS NO PROOF THAT CRANSTON'S ASSISTANCE TO KEATING WAS GIVEN IN EXCHANGE FOR THE CONTRIBUTIONS SOLICITED FROM KEATING BY CRANSTON, ON FIVE OCCASIONS THE CONTRIBUTIONS WERE SOLICITED AND GIVEN CLOSE IN TIME TO THE SERVICES PROVIDED BY CRANSTON OR CRANSTON'S OFFICE. LACKING PROOF OF A DIRECT NEXUS BETWEEN CRANSTON'S SERVICES AND THE CONTRIBUTIONS, LOS ANGELES AUSA AND DOJ ATTORNEY HAVE REQUESTED THAT OTHER BUSINESSMEN WHO CONTRIBUTED SUBSTANTIAL SUMS SOLICITED

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BY CRANSTON BE INTERVIEWED. A NUMBER OF MAJOR CRANSTON CONTRIBUTORS WERE SELECTED BASED ON SEVERAL FACTORS, INCLUDING THE SIZE OF THEIR CONTRIBUTIONS, CRANSTON'S PERSONAL INVOLVEMENT IN SOLICITING THE CONTRIBUTIONS, AND THE CONTRIBUTOR'S STATUS AS A BUSINESSMAN. IT IS NOT KNOWN WHETHER ANY OF THESE CONTRIBUTORS HAD LEGISLATIVE OR REGULATORY MATTERS PENDING WITH CRANSTON'S OFFICE. THE PURPOSE OF THESE INTERVIEWS IS TO DETERMINE WHETHER THESE INDIVIDUALS HAD REQUESTED ASSISTANCE FROM CRANSTON'S OFFICE, AND WHETHER CRANSTON HAD COERCED OR PRESSURED THE INDIVIDUALS INTO CONTRIBUTING IN ORDER TO OBTAIN SERVICES FROM HIS OFFICE. THUS, EACH OF THESE INDIVIDUALS SHOULD BE ASKED ABOUT THE CIRCUMSTANCES OF THEIR CONTRIBUTIONS, INCLUDING THE DETAILS OF THE SOLICITATIONS, WHETHER THEY HAD ANY DEALINGS WITH CRANSTON OR CRANSTON'S OFFICE ON SPECIFIC MATTERS, AND WHETHER THEY FELT COMPELLED OR PRESSURED TO CONTRIBUTE IN ORDER TO RECEIVE THE SERVICES FROM CRANSTON'S OFFICE.

RECEIVING DIVISIONS ARE REQUESTED TO REPORT RESULTS TO

BOTH PHOENIX AND LOS ANGELES DIVISIONS.

LEADS, CINCINNATI AT CINCINNATI, OHIO: INTERVIEW

PAGE FOUR DE FBILA 0003 UNCLAS
AMERICAN FINANCIAL CORPORATION, P.O. BOX 806,
CINCINNATI, OHIO, 45201. CONTRIBUTED
\$25,000 TO THE FORUM INSTITUTE, WHICH WAS RECEIVED ON 5/26/88.
VIRTUALLY NO DOCUMENTATION OF THIS CONTRIBUTION COULD BE FOUND
IN FORUM'S FILES, AND SO IT IS UNKNOWN WHETHER CRANSTON
ACTUALLY SOLICITED THE CONTRIBUTION. BEFORE MOVING TO
PHOENIX, KEATING WAS EMPLOYED BY AND THEY APPARENTLY
REMAINED BUSINESS FRIENDS.
DALLAS AT FORT WORTH, TEXAS: INTERVIEW
FIRST CITY PROPERTIES, INC., 3200 FIRST CITY BANK TOWER, 201
MAIN STREET, FORT WORTH, TEXAS, POSSIBLE TELEPHONE NUMBER
CONTRIBUTED
\$150,000 TO USA VOTES APPARENTLY IN 1988. ACCORDING TO AN
INTERNAL MEMO WRITTEN BY \$100,000 OF THE \$150,000
WAS "VIA BENTSEN", PRESUMABLY U.S. SENATOR LLOYD BENTSEN OF
TEXAS. IN EARLY 1989, WAS APPARENTLY SOLICITED TO
CONTRIBUTE \$100,000 TO THE SOUTHWEST VOTER REGISTRATION
PROJECT, ALTHOUGH WAS REQUESTED TO SEND HIS CHECK TO
CRANSTON OR TO MAKE IT PAYABLE TO USA VOTES. CRANSTON'S NOTES
REFLECT THAT HE SPOKE WITH ON 3/9/89, AND STATED HE
WAS FRUSTRATED BY THE LACK OF INFORMATION AND THAT HE WANTED A

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PAGE FIVE DE FBILA 0003 UNCLAS

REPORT ON SOUTHWEST VOTER REGISTRATION PROJECT'S PAST
ACCOMPLISHMENTS. IT IS UNCERTAIN WHETHER EVER
CONTRIBUTED THE \$100,000 TO SOUTHWEST IN 1989. PER THE FAXES
TO DALLAS, IT IS APPARENT THAT CRANSTON WAS INVOLVED IN
ACQUISITION FROM THE GOVERNMENT OF AMERICAN SAVINGS IN
CALIFORNIA, ALTHOUGH IT IS UNCLEAR WHETHER CRANSTON ASSISTED
IN THIS TRANSACTION.
NEW YORK AT NEW YORK CITY: INTERVIEW
JENNISON ASSOCIATES CAPITAL CORPORATION, 466 LEXINGTON AVENUE,
NEW YORK, NEW YORK, TELEPHONE RECORDS SHOW
CONTRIBUTED \$25,000 TO THE FORUM INSTITUTE WHICH WAS
RECEIVED ON 11/29/87, AND AN ADDITIONAL \$25,000 TO FORUM
RECEIVED ON 11/29/87, AND AN ADDITIONAL \$25,000 TO FORUM INSTITUTE RECEIVED ON 3/18/88. ALSO CONTRIBUTED \$10,000
INSTITUTE RECEIVED ON 3/18/88. ALSO CONTRIBUTED \$10,000
INSTITUTE RECEIVED ON 3/18/88. ALSO CONTRIBUTED \$10,000 TO USA VOTES IN 1987 AND 1988. CRANSTON'S NOTES SHOW THAT ON
INSTITUTE RECEIVED ON 3/18/88. ALSO CONTRIBUTED \$10,000 TO USA VOTES IN 1987 AND 1988. CRANSTON'S NOTES SHOW THAT ON 4/13/89, CRANSTON REQUESTED THAT CONTRIBUTE AN
INSTITUTE RECEIVED ON 3/18/88. ALSO CONTRIBUTED \$10,000 TO USA VOTES IN 1987 AND 1988. CRANSTON'S NOTES SHOW THAT ON . 4/13/89, CRANSTON REQUESTED THAT CONTRIBUTE AN ADDITIONAL \$25,000 TO FORUM INSTITUTE AND \$5,000 TO USA VOTES.
INSTITUTE RECEIVED ON 3/18/88. ALSO CONTRIBUTED \$10,000 TO USA VOTES IN 1987 AND 1988. CRANSTON'S NOTES SHOW THAT ON 4/13/89, CRANSTON REQUESTED THAT CONTRIBUTE AN ADDITIONAL \$25,000 TO FORUM INSTITUTE AND \$5,000 TO USA VOTES. RECORDS ALSO SHOW THAT USA VOTES FUND RAISER

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PAGE SIX DE FBILA 0003 UNCLAS
FLOOR, NEW YORK, TELEPHONE RECORDS
SHOW THAT CRANSTON MET WITH AT OFFICE AT 10:30
A.M. ON 2/29/88, POSSIBLY ACCOMPANIED BY AND
PER THE FAXES TO NEW YORK, APPARENTLY
PLEDGED TO CONTRIBUTE \$100,000 BY 4/1/88. RECORDS SHOW
TELEPHONED ON APPROXIMATELY 4/13/88, AND THAT FORUM
INSTITUTE RECEIVED \$100,000 FROM ON 5/3/88, RESULTING IN
CRANSTON'S THANK YOU LETTER DATED 5/9/88.
SAN FRANCISCO AT TIBURON, CALIFORNIA: INTERVIEW
TIBURON, CALIFORNIA, 94920.
CONTRIBUTED \$25,000 TO CPD ON A CHECK DATED 9/7/88 DRAWN ON
THE ACCOUNT OF
CHARITABLE TRUST AT THE SAN RAFAEL MAIN OFFICE OF BANK OF
AMERICA. CHARITABLE TRUST CONTRIBUTED AN ADDITIONAL
\$15,000 TO CPD, WHICH WAS RECEIVED ON 3/14/89.
SAN FRANCISCO AT SAN FRANCISCO, CALIFORNIA: INTERVIEW
SWIG FOUNDATION, FAIRMONT HOTEL, SAN FRANCISCO,
CALIFORNIA, TELEPHONE RECORDS SHOW THE SWIG
вт
#0003

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0020 MRI 00136

RR FBICI FBIDL FBINY FBISF FBISI FBIWMFO RUCNFB FBIPX

DE FBILA #0004 2270603

ZNR UUUUU

R 150205Z AUG 91

FM FBI LOS ANGELES (58C-PX-41605) (SARA) (P)

TO FBI CINCINNATI/ROUTINE/

FBI DALLAS/ROUTINE/

FBI NEW YORK/ROUTINE/

FBI SAN FRANCISCO/ROUTINE/

FBI SPRINGFIELD/ROUTINE/

FBI WMFO/ROUTINE/

INFO DIRECTOR FB1/ROUTINE/

FBI PHOENIX/ROUTINE/

BT

UNCLAS

SECTION THREE OF THREE SECTIONS

CITE: //3410:0670//

PASS: FBIHQ PUBLIC CORRUPTION UNIT.

SUBJECT: ALLEGATIONS CONCERNING U.S. SENATORS ALAN CRANSTON,

PAGE TWO DE FBILA 0004 UNCLAS

DENNIS DECONCINI, JOHN GLENN, JOHN MCCAIN, DONALD RIEGLE;
CHARLES H. KEATING, JR., DBA LINCOLN SAVINGS AND LOAN
ASSOCIATION, IRVINE, CALIFORNIA, AND AMERICAN CONTINENTAL
CORPORATION, PHOENIX, ARIZONA; CORRUPTION OF FEDERAL PUBLIC
OFFICIALS - LEGISLATIVE; OO: PX/LA.

TEXT CONTINUES:

FOUNDATION CONTRIBUTED \$50,000 TO THE FORUM INSTITUTE IN 1986,
POSSIBLY FOLLOWING A MEETING OF AND SENATOR JAY
ROCKEFELLER IN 9/86. RECORDS SHOW THAT THE SWIG FOUNDATION
CONTRIBUTED \$25,000 TO THE FORUM INSTITUTE WHICH WAS RECEIVED
ON 9/27/87, AND AN ADDITIONAL \$25,000 TO CPD RECEIVED ON
5/12/88. ALAN CRANSTON WROTE
SEPARATE THANK YOU LETTERS DATED 11/13/87, 6/1/88, AND 6/2/88.
HOSTED A FUND RAISING EVENT FOR CRANSTON'S CAMPAIGN
IN 9/86, WHICH RAISED \$10,000.
SPRINGFIELD AT DECATUR, ILLINOIS: INTERVIEW
ARCHER DANIELS MIDLAND CO., 4868 FARIES PARKWAY,
DECATUR, ILLINOIS, TELEPHONE ARCHER DANIELS
MIDLAND (ADM) CONTRIBUTED \$50,000 TO THE MISSING HALF THROUGH
AMERICAVOTES IN 1986. RECORDS SHOW ADM CONTRIBUTED A TOTAL OF
\$200,000 TO THE FORUM INSTITUTE AS FOLLOWS: \$50,000 ON

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PAGE THREE DE FBILA 0004 UNCLAS

5/3/88, \$50,000 ON 5/11/88, AND \$100,000 ON 9/26/88. A
CRYPTIC NOTE ON AN INTERNAL LIST OF FORUM CONTRIBUTORS STATES
IN REFERENCE TO THE ADM CONTRIBUTIONS TO FORUM "3RD FROM
IDENTITY IS UNKNOWN TO LOS ANGELES
DIVISION. RECORDS SHOW CRANSTON SENT
LETTER DATED 5/4/88. IT HAS BEEN WIDELY REPORTED IN THE MEDIA
THAT ADM HAS BEEN POLITICALLY ACTIVE PROMOTING ETHANOL AS AN
ADDITIVE TO GASOLINE. ADM PRODUCES APPROXIMATELY 70% OF
DOMESTIC ETHANOL. IN 1990, ADM AND OTHERS SUCCEEDED IN
OBTAINING AMENDMENTS TO THE CLEAN AIR ACT AND THE INTERNAL
REVENUE CODE THAT PROMOTED THE USE OF ETHANOL. IT IS UNKNOWN
WHETHER CRANSTON OR CRANSTON'S OFFICE ASSISTED ADM IN THESE OR
ANY OTHER LEGISLATIVE OR REGULATORY MATTERS.
WMFO AT WASHINGTON, D.C.: INTERVIEW
THE KAEMPFER COMPANY) 1250 24TH STREET, NORTHWEST, SUITE
300, WASHINGTON, D.C. IS MENTIONED IN
MEMORANDUM FAXED TO WMFO AS SOMEONE WHO HAD BEEN HELPFUL TO
CRANSTON AND WHO EXPECTED ASSISTANCE IN OBTAINING AN EXEMPTION
FOR A BUILDING HE WAS CONSTRUCTING IN ROSLYN FROM HEIGHT
RESTRICTIONS THAT WAS IN A BILL CRANSTON HAD INTRODUCED. IN

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PAGE FOUR DE FBILA 0004 UNCLAS 9/86, HOSTED A FUND RAISING EVENT AT HIS HOME IN WHICH APPROXIMATELY \$200,000 WAS RAISED FOR CRANSTON'S 1986 CAMPAIGN, AND OF WHICH APPROXIMATELY \$20,000 WAS RAISED BY HIMSELF. WAS ALSO THE LANDLORD FOR CDC'S OFFICES AT 1250 24TH STREET, NORTHWEST, SUITE 300, WASHINGTON, D.C. (SAME ADDRESS AS AND FREQUENTLY ALLOWED CDC'S \$500 PER MONTH RENT TO GO UNPAID. FOR EXAMPLE, FEDERAL ELECTION COMMISSION RECORDS SHOW THAT CDC PAID THE KAEMPFER COMPANY \$5,000 OF RENTS IN ARREARS ON 3/15/88, AND KAEMPFER CONTRIBUTED \$5,000 TO CDC ON 4/4/88. ACCORDING TO ATTORNEY DID NOT RECEIVE THE RELIEF HE HAD REQUESTED FROM CRANSTON IN CONNECTION WITH HIS ROSLYN BUILDING. вт #0004

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0015 MRI 00242 RR RUCNFB FBILA FBIPX DE FBIDL #0002 2290449 ZNR UUUUU R 170402Z AUG 91 FM FBI DALLAS (58C-PX-41605) (FWRA) (P) TO DIRECTOR FBI/ROUTINE/ FBI LOS ANGELES/ROUTINE/ FBI PHOENIX/ROUTINE/ вт **UNCLAS** CITE: //3190:4840 // SUBJECT: ALLEGATIONS CONCERNING U. S. SENATOR ALAN CRANSTON; ET AL; CFPO-L; OO: PHOENIX/LOS ANGELES. RE LOS ANGELES TELETYPE TO DALLAS, ET AL, 8/15/91. ON 8/16/91, FT. WORTH, TEXAS, ADVISED HE HAD SPOKEN WITH WHO IS CURRENTLY IN MAINE. INDICATED HE WOULD WILLINGLY FURNISH ALL DETAILS

REGARDING THIS MATTER BUT NECESSARY RECORDS AND DOCUMENTS TO

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PAGE TWO DE FBIDL 0002 UNCLAS

REFRESH HIS MEMORY AND PROVIDE DETAILS ARE IN FT. WORTH.

тн. |

WILL RETURN TO FT. WORTH 8/26/91, AND AN FB! INTERVIEW IS

SCHEDULED WITH HIM FOR 8/27/91.

BT

#0002

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	FDI		
TRANSMIT VIA: Teletype Facsimile AIRTEL	PRECEDENCE: Immediate Priority Routine	CLASSIFICATION: TOP SECRET SECRET CONFIDENTIAL UNCLAS E F T O UNCLAS	
		Date8/19/91	
	ANGELES (58C-PX-416)		
ALLEGATIONS CONCERNIALAN CRANSTON, DENNIJOHN GLENN, JOHN MC CHARLES H. KEATING, LINCOLN SAVINGS AND OF CALIFORNIA (LSL) CONTINENTAL CORPORAT PHOENIX, ARIZONA; CORRUPTION OF FEDERAL OFFICIALS-LEGISLATIVE OO: PX/LA	S D. DE CONCINI, CAIN, DONALD REIGI JR., dba LOAN ASSOCIATION AND AMERICAN CION (ACC),	LE ;	
Re LA 6/ on 7/3/91.	'12/91 tel to WMFO	and WMFO facsimile to	LA
Enclosed copies of the FD-302 containing related i	of	are the original and to and a 1A envelope	wo
	d for Phoenix are to for information).	two copies of the FD-30	02 of
This mate and the second of th	ter remains pendir	SEARCHED INDEXED FILED AUG 26 1991 SEARCHED FILED AUG 26 1991	2605-72
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Approved: _____ Transmitted _____ Per _____

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FEDERAL BUREAU OF INVESTIGATION					
Date of transcription 7/3/91					
residence					
Falls Church, Virginia, residence telephone					
date of birth was interviewed in					
the law offices of Perkins Coie, 607 Fourteenth Street, N.W.,					
Suite 800, Washington D.C., where she was accompanied by attorney					
telephone number					
was advised of the official identities of the interviewing					
Special Agents, and that the interview concerned fund raising for					
United States Senator DONALD RIEGLE, particularly matters					
relating to CHARLES KEATING. then furnished the					
following information:					
The color of the committee of the Deutshautwein					
When asked about the opening of the <u>Pontchartrain</u> Hotel, at Detroit, Michigan, on March 1, 1986. stated					
Hotel, at Detroit, Michigan, on March 1, 1986, stated that she was aware that Senator RIEGLE attended the notel's					
opening. She did not know whether RIELGE staffer					
attended.					
· · · · · · · · · · · · · · · · · · ·					
association with RIEGLE began when she worked					
on his 1982 re-election. When he won, he brought her to his					
Senate staff. She worked for a					
number of years, and began to assume some of the fund raising					
responsibility.					
CHARLES KEATING became known to in January,					
CHARLES KEATING became known to in January,					

File # 58C-PX-416055u Investigation on 7/1/91 at Washington, D.C. Date dictated bу

Continuation of FD-302 of	, On	7/1/91	_, Page 2 b6
	,		- D/G
raiser. She did not kn solicited by RIEGLE or some who held fund raisers volunt	one associated with him	hat it was m. Most pe	
		 1	Ь6
such an event began with the listed the host, where it was convenient for the host and would look at the number of possible days for host, and a date was decided	as to be held, dates to a target goal of mone are information and substitute event. When the event was information. The homitted to the Senate of the Senate	a form, which at were y to be raise mit to sold contacted another tel	or b70 ich ised. ct the er
In making arrangom	ents for the Hotel Po	ntchartrai:	n fund
raiser, for coordination wit worked primarily with would deal with	th American Continenta	l, not availal CHAR	ble, b70
never dealt directly with KE			r the
fund raiser.			
these <u>matters</u> in the January	vents stood out in her v-March, 1987 time per a trip by RIEGLE to Ph RIEGLE was	iod, oenix, Ari:	zona, b6
at American Continental, sin were planning the March, 198 asked to pl	scheduled event, a N a "stop by" around Mance it was based in Ph 37 fund raiser in Detran the American Conti	ew England rch 6, 7 or oenix and f oit. pental vis	Life r 10, thev
	C a roadriic vrore.		b 6
American Continental. Becau Michigan, the lists included hoped would attend. RIEGLE'	l names of previous do	e held in nors, whom	they
people to be "comped," being would attend without paying.	persons like public	officials v	who

Continuation of	FD-302 of		, On	7/1/91	, Page
•	whose names were furnished wou thought that wanted to invited.	ald be sent invit know whom RIEGLA			
	was involved of FEC (Federal Election Commiscontributions in question.	d in the preparatistics in the preparation in the p			
; ; ;	When asked whether in the put her on notice that the majassociated with CHARLES KEATING stated, "I was not alarmed by been doing fund raisers "for ya fund raiser, the first peoplare their employees and family that any money came from Michigan."	jority of the mor NG, and not from that." She stat years," and when le that they go thes. She added,	ney o Mich ted t peop to fo "The	came from igan, that she igan she igan, the igner contribute only recontribute only re-	people had to do butions ason
]	When asked how many said one time, that she down in a room with him." The was waiting to see Senator RIP RIEGLE's office, and the reception with him because she knew that raiser	ne shook his hand e one meeting occ EGLE, in the rece ptionist called was wor erself, saving so	d, bucurre eptic rking ometh We a	at did not be when King area of the second to second to the appreciate second to the s	t "sit EATING f hat" fund he
:	occurred at the <mark>Senate offi</mark> ce. raiser <u>at the Hotel Pontc</u> hartı		tend	the fund	
•	When drop off documents with drinks," which she assumed were turned down. He also encourage	ce social invitat	ed h	ner out ":	ich she
7]	When asked whether to meetings, said that the when he came into her office. not involved in legislative acceptance, KEATING or During telements.	ne closest thing pointed point	would out and	d have be that she she never that she never the she never the she with	een e was er

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Continuation of FD-302	of				, On	7/1/9	1, Page4
her a	rea,]ha iate	and she wo	ould "cut thing of d him "to	off" the a substan	some tanger topic: Sl tive nature She was no	ne state e, she w	d that, if ould have
Ameri		di Continental when	L other	call any than availabl	discussions or occa	s with a	nyone from y
with[She d	id n	or aske	and Loan ed her fo knowledge	(LSL) eve r assista of LSL's	lse at Amer r discussed nce regard problems u	d problem ing such	ms of LSL matters.
learn file event	ed a woul	nd DONALD H bout it "ri d show when	RIEGLE on ight afte n she req no addit	January r it occu uested da ional kno	eting betwee 28, 1987. rred." Doo tes for the wledge abou	She prol cuments : e fund ra	bably in the aising
Bank not kind matte Janua on bel	now rs f ry 2	y LSL for F d (FHLBB),] was worki what they w rom the med 8, 1987 med	RIEGLE's ing on so were. Sh dia. eting and G, LSL or	assistance stated the me of the e later l was did not	he became a e with the at she "kne ir requests earned thir not present personally Continenta	Federal w but ngs about during work on	Home Loan she did t such the anything
employ a good amound out." for a repeat asked affil:	yees is contained ted agai	tel Pontcha of CHARLES ount. Agai ontributed e stated the n going on, that she di in about whe s of Americ	artrain e KEATING in, it di by famil nat, if s "it mig id not ha nat part can Conti	vent came , dn't conc y and emp he had kn ht have c ve a legi of the co nental,	ern me. I loyees. It own that th oncerned me slative fur ntributions	ly, associately, associately as the left in the left i	ciates and new it was n larger stand e requests

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58C-PX-41605

Continuation of FD-302 of, On, On, Page	5
When asked whether she ever discussed the source of these funds with Senator RIEGLE, or anyone else, stated that "Some of the money was handed to me by the Senator." This would have been "money he would've received at the Pontchartrain." Thus, she assumed that he knew, but she does not know how much it was or the per cent of the total. stated that "The checks indicated on the March 23 or 24 FEC report are most likely the ones RIEGLE brought back." She stated that the FEC report would also include any checks received that day in the mail.	
was asked what procedure was used for the preparation of FEC reports including the Pontchartrain contributions. She stated that, since it was not an election year, the report would not have been due until July 31. In determining contributors' employers, some checks would have a business card, or give the information on the response card. provided a brochure with a list of holdings and affiliates.	
typed a list and sent it to and asked her to fill in the missing information in the blanks.	
A company named Public Office Corporation maintains records of contributions for RIEGLE's office. All checks are copied and sent to Public Office Corporation, to their computer person, who adds them into the system. Just before the FEC report is due, point of contact, (last name not recalled) sends a printout to who identifies "holes" regarding information and identifies contributions with particular events. She calls the host and gets other missing information.	
When asked whether ever commented regarding any apparent problems, said that she would occasionally note if a person was "over the limit." would send a letter to the individual, requesting permission to put the excess funds (above the amount allowed for the primary election) toward the general election. The limit is \$1,000 for the primary, and \$1,000 for the general election. In the KEATING situation, the information was designated on most checks.	
In preparing the FEC reports, handled all	

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was in and out a lot, in the first half of 1987. She did

knew that

not hear the subject matter discussed in these visits. For the

trying to see

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58C-PX-41605	
Continuation of FD-302 of	. , On 7/1/91 , Page 7
	e assumed that it had to do with the recall being aware of any problems.
<u>in arranging an April 2, 19</u>	ware of any function by Senator RIEGLE 87 meeting among nor a related meeting on April 9,

answered in the negative when asked about knowledge of any efforts to assist KEATING or his interests in relation to the Internal Revenue Service's "qualified lender test" or the FHLBB's regulation of "direct investments."

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FD-302a (Rev. 11-15-83)

0020 MRI 00289 RR RUCNFB FBILA FBIPX DE FBIDL #0004 2350915 ZNR UUUUU R 230354Z AUG 91 FM FBI DALLAS (58C-PX-41605) (P) TO DIRECTOR FBI/ROUTINE/ FBI LOS ANGELES/ROUTINE/ FBI PHOENIX/ROUTINE/ вт **UNCLAS** CITE: //3190:4840 // SUBJECT: ALLEGATIONS CONCERNING U.S. SENATOR ALAN CRANSTON; ET AL; CFPO - L; OO: PHOENIX/LOS ANGELES. RE DALLAS TELETYPE TO DIRECTOR 8/17/91. ON 8/22/91, FORT WORTH, TEXAS, ADVISED HAD CALLED AND REQUESTED INTERVIEW DATE BE CHANGED TO 9/5/91, BECAUSE OF ONE WEEK DELAY IN RETURNING TO FORT WORTH. UAC, INTERVIEW WITH WILL BE CONDUCTED ON

SENTONED_____INCLXED______
SENTALIZED_G____FILED G______

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9/5/91 AT FORT WORTH DUE TO NECESSITY HE REFER TO DOCUMENTS IN FORT WORTH.

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#0004

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DE FBICI #0012 2382222

ZNR UUUUU

R 262138Z AUG 91

FM FBI CINCINNATI (58C-PX-41605) (P)

TO FBI LOS ANGELES (58C-PX-41605) (SARA)/ROUTINE/

FBI PHOENIX (58C-PX-41605)/ROUTINE/

вт

UNCLAS A.

CITE: //3160//

SUBJECT: ALLEGATIONS CONCERNING U. S. SENATORS ALAN CRANSTON, ET AL. CORRUPTION OF FEDERAL PUBLIC OFFICES-LEGISLATIVE.

OO:PHOENIX/LOS ANGELES.

RE LOS ANGELES TELETYPE TO BUREAU, AUGUST 15, 1991.

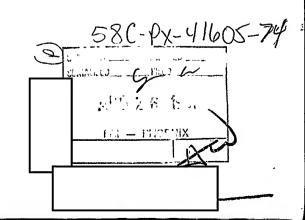
FBI CINCINNATI HAS MADE A REQUEST TO INTERVIEW

CORPORATION, CINCINNATI, OHIO, CONCERNING THE EXTENT AND
NATURE OF HIS INVOLVEMENT WITH U. S. SENATOR ALAN CRANSTON
AND CRANSTON'S STAFF. GENERAL COUNSEL FOR AMERICAN FINANCIAL

AMERICAN FINANCIAL

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PAGE TWO DE FBICI 0012 UNCLAS

CORPORATION, HAS ADVISED THAT RESEARCH OF THIS MATTER SHOULD

BE COMPLETED WITHIN THE NEXT TWO WEEKS AND THAT WOULD

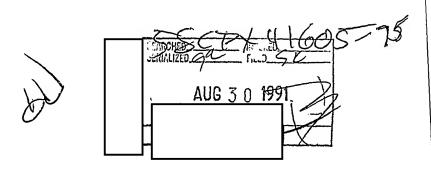
CONSIDER GRANTING SUCH AN INTERVIEW AT THAT TIME.

THE ABOVE IS BEING SUBMITTED FOR THE INFORMATION OF RECEIVING OFFICES.

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PRECEDENCE

COVERSHEET FBI FACSIMILE LOS ANGELES DIVISION SANTA ANA RA

CLASSIFICATION

O IMMEDIATE	O TOP SECRET	TIME TRANSMITTED					
O PRIORITY	O SECRET	SENDER'S INITIALS					
X ROUTINE	O CONFIDENTIAL	NUMBER OF PAGES 3					
;	O SENSITIVE						
	W UNCLASSIFIED						
TO: SAC, PHOENIX	(58c-Px-41605)	DATE: 8/29/9/					
FACSIMILE NUMBER: _							
ATTN: SA							
FROM: SAC, LOS ANGELES (580-PX-41605) (SARA)							
SUBJECT: ALAN CRANSTON, et al							
SPECIAL HANDLING INSTRUCTIONS: LE SE HAND CARRY TO							
***************************************	0.						
ORIGIN. 'S NAME: _							
ORIGI: ATOR'S FACIMIL	E NUMBER: (714)	542-8825					
APPROVED:		<i>r</i>					

FD-36 (Rev. 8-29-85)

	FBI					
**************************************	PRECEDENCE: ☐ Immediate ☐ Priority ☐ Routine	CLASSIFICATION: TOP SECRET SECRET CONFIDENTIAL UNCLAS E F T O UNCLAS				
		Date 8/29/91				
FM FBI LOS ANGELI	ES (58C-PX-41605)	(SARA) (P)				
TO FBI SACRAMENTO)/ROUTINE/					
FBI PHOENIX/ROUT	INE/					
BT						
UNCLAS						
SUBJECT: ALLEGAT	TIONS CONCERNING U	.s. senators alan cra	ANSTON,			
DENNIS DECONCINI,	, JOHN GLENN, JOHN	MCCAIN, DONALD RIEG	LE;			
CHARLES H. KEATII	CHARLES H. KEATING, JR., DBA LINCOLN SAVINGS AND LOAN					
ASSOCIATION, IRV	ASSOCIATION, IRVINE, CALIFORNIA, AND AMERICAN CONTINENTAL					
CORPORATION, PHOENIX, ARIZONA; CORRUPTION OF FEDERAL PUBLIC						
OFFICIALS - LEGIS	SLATIVE; OO: PHOE	NIX/LOS ANGELES.				
RE SANTA ANA	SA	TELCALL TO SACRAM	ENTO SRA			
OI	N 8/28/91.					
AS DISCUSSED	IN REFERENCED TE	LCALL, LOS ANGELES SA	's			
	INT	END TO TRAVEL TO MOD	ESTO,			
JAJ/clm	•					
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			· ·			

Approved: LCru/

Transmitted

(Number) (Time)

Per ____

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CALIFORNIA, ON 8/30/91, FOR THE PURPOSE OF CONDUCTING AN INTERVIEW IN CAPTIONED MATTER. PLANNED INTERVIEW IS OF ERNEST GALLO, E AND J GALLO WINERY, 600 YOSEMITE BOULEVARD, MODESTO, CALIFORNIA. GALLO WILL BE INTERVIEWED IN CONNECTION WITH THE \$300,000 THAT HE CONTRIBUTED IN 1987-89 TO VOTER REGISTRATION GROUPS AFFILIATED WITH SENATOR ALAN CRANSTON.

SACRAMENTO SA WILL ASSIST IN THE INTERVIEW.

SAC SACRAMENTO AND SAC LOS ANGELES CONCUR WITH PROPOSED

TRAVEL.

BT

/READ /REF 6 0035 MRI 01911

RR FBILA FBIPX

DE FBICI #0010 2412125

ZNY EEEEE

R 292105Z AUG 91

FM FBI CINCINNATI (58C-PX-41605) (P)

TO FBI LOS ANGELES (580-PX-41605) (SARA)/ROUTINE/

FBI PHOENIX (58C-PX-41605)/ROUTINE/

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UNCLAS E F T O W

CITE: //3160//

SUBJECT: ALLEGATIONS CONCERNING U.S. SENATORS ALAN CRANSTON; ET AL; CORRUPTION OF FEDERAL PUBLIC OFFICIALS - LEGISLATIVE.

OO: PHOENIX/LOS ANGELES.

RE LOS ANGELES TELETYPE TO CINCINNATI DATED AUGUST 15, 1991, AND CINCINNATI TELETYPE TO LOS ANGELES DATED AUGUST 26, 1991.

ON AUGUST 26, 1991,

AMERICAN FINANCIAL CORPORATION, PROVIDENT TOWER, 1 EAST FOURTH STREET, CINCINNATI, OHIO 45202, WAS CONTACTED PURSUANT TO

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SERVENCE OF THE SEC SHALLED SIC FIFED SIC FIFE

PAGE TWO DE FBICI 0010 UNCLAS E F T O
REFERENCED LOS ANGELES TELETYPE TO CINCINNATI, AUGUST 15,
1991.

LINDNER ADVISED THAT HE HAS KNOWN U.S. SENATOR ALAN
CRANSTON CASUALLY FOR MANY YEARS BASED UPON PASSING CONTACTS
AT VARIOUS PUBLIC AND SEMI-PUBLIC FUNCTIONS. HE INDICATED
THAT THEY NEITHER WERE NOR ARE PERSONAL FRIENDS.

HE ADVISED THAT NEITHER HE NOR TO HIS KNOWLEDGE HIS STAFF
HAS EVER HAD OCCASION TO CONTACT CRANSTON OR HIS STAFF WITH
REGARD TO ANY LEGISLATIVE OR REGULATORY MATTERS RELATED TO
AMERICAN FINANCIAL CORPORATION.

NEITHER CRANSTON NOR HIS STAFF HAVE EVER PRESSURED OR

OTHERWISE ATTEMPTED TO COERCE REGISTRATION OF AMERICAN FINANCIAL

CORPORATION TO MAKE POLITICAL CONTRIBUTIONS.

ACKNOWLEDGED THAT AMERICAN FINANCIAL CORPORATION

MADE A \$25,000.00 CONTRIBUTION BY CHECK TO THE FORUM INSTITUTE

ON OR ABOUT MAY 26, 1988. THIS CONTRIBUTION IS CONSIDERED BY

TO BE A SOFT MONEY POLITICAL CONTRIBUTION INASMUCH AS

IT WAS HIS UNDERSTANDING THAT THE MONEY WOULD BE UTILIZED FOR

"GET OUT THE VOTE" OR VOTER REGISTRATION OBJECTIVES. HE

UNDERSTOOD THAT THE FORUM INSTITUTE WAS ASSOCIATED WITH

CRANSTON IN SOME UNRECALLED AND UNSPECIFIED WAY. HE RECALLS

ь6 ь7с PAGE THREE DE FBICI 0010 UNCLAS E F T O

OBTAINING THIS INFORMATION ABOUT AND THE SOLICITATION TO				
CONTRIBUTE TO THE FORUM INSTITUTE FROM AN UNRECALLED FEMALE				
ASSOCIATE OF CRANSTON.				
ADVISED THAT HE WAS UNFAMILIAR WITH THE NAMES				
COMMENTED THAT HE AND/OR AMERICAN FINANCIAL				
CORPORATION RECEIVE APPROXIMATELY 10 TO 15 SOLICITATIONS PER				
DAY FOR CONTRIBUTIONS AND DONATIONS.				
INITIALLY ALLUDED TO THE EXISTENCE OF A FILE AT				
AFC WHICH CONTAINED INFORMATION CONCERNING POLITICAL				
CONTRIBUTIONS MADE BY AFC AND/OR WHEN WAS				
CONTRIBUTIONS MADE BY AFC AND/OR WHEN WAS IMMEDIATELY ADVISED BY THE AFC				
IMMEDIATELY ADVISED BY THE AFC				
IMMEDIATELY ADVISED BY THE AFC THAT EFFORTS TO LOCATE SUCH A FILE HAD NOT BEEN SUCCESSFUL,				
IMMEDIATELY ADVISED BY THE AFC THAT EFFORTS TO LOCATE SUCH A FILE HAD NOT BEEN SUCCESSFUL, RESPONDED				
IMMEDIATELY ADVISED BY THE AFC THAT EFFORTS TO LOCATE SUCH A FILE HAD NOT BEEN SUCCESSFUL, RESPONDED THAT THE ONLY RECORD FOR SUCH CONTRIBUTIONS MAY BE THE				
IMMEDIATELY ADVISED BY THE AFC THAT EFFORTS TO LOCATE SUCH A FILE HAD NOT BEEN SUCCESSFUL, RESPONDED THAT THE ONLY RECORD FOR SUCH CONTRIBUTIONS MAY BE THE CANCELLED CHECKS. AUTHORIZED EVANS TO PROVIDE TO THE				
IMMEDIATELY ADVISED BY THE AFC THAT EFFORTS TO LOCATE SUCH A FILE HAD NOT BEEN SUCCESSFUL, RESPONDED THAT THE ONLY RECORD FOR SUCH CONTRIBUTIONS MAY BE THE CANCELLED CHECKS. AUTHORIZED EVANS TO PROVIDE TO THE FBI A COPY OF THE CANCELLED CHECK MADE PAYABLE TO THE FORUM				

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PAGE FOUR DE FBICI 0010 UNCLAS E F T O CONTRIBUTION TO THE FORUM INSTITUTE.

UPON RECEIPT, A COPY OF THIS CHECK WILL BE FORWARDED TO LOS ANGELES AND PHOENIX.

AIRTEL AND FD-302 TO FOLLOW.

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FBI

TRANSMIT VI Teletype Facsimile AIRTEL	☐ Immediate ☐ Priority	CLASSIFICATION: TOP SECRET SECRET CONFIDENTIAL UNCLAS E F T O UNCLAS
		Date 9/12/91
TO	: SAC, LOS ANGELES (580	:-PX-41605) (SARA)
FROM	: SAC, SPRINGFIELD (580	:-PX-41605) (RUC)
SUBJECT	and American Continent Phoenix, Arizona	DECONCINI, CAIN, DONALD RIEGLE; GR., dba Lincoln ociation, Irvine, California,
copies of	eflecting interview of $lacksquare$	MPANY, Decatur, Illinois; two aformation furnished by ag computer printouts
original furnishe	ng interview of an in	described above; the sert regarding information one FD-340 containing sbursements by ADM.
2) - Phoe	Angeles (58C-PX-41605) (nix (58C-PX-41605) (Encl nix (58C-PX-41605) ngfield (58C-PX-41605) 1*	
Approved	Transmitted	Par

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FEDERAL BUREAU OF INVESTIGATION

		Date of transcriptio	n 9/12/91	
was interviewed regarder of the following entering or the CITIZENS PART nature of any contact CRANSTON.	f), 4666 Faries Parkwarding his knowledge cities: AMERICAVOTES CICIPATION PROJECT: cts between he and Unwas aware of the identice the nature of the inton:	ay, telephone of contribut, USA VOTES, THE MISSING Integral to the tity of the	ions made to any FORUM INSTITUTE, HALF, also the Senator ALAN	
\$50,000 was made in individuals at atterwashington, D.C., in contribution to the difficulty in recalists constantly asked variety of organizations.	dvised that the inition response to a request dance in a meeting of a second republicans in 1986. In a specifically who by various people to the cions. In a second did republicans to assist in vertical second republicans.	t by an unknors of a group of sed that he made the reamake contrib	own individual or democrats in made an equal id that he had quest because he butions to a he purpose of this	ь6 ь70
contribution, he contribution is contributed assistant and a second contribution and he contrib	aid that after making ntinued to make annual spose of the organiza segistration. aid that he has had n al for soliciting the of issuing the check tons are delegated to	l contribution tion was benoted to personal contributions and follows	ons/donations, as eficial in ontact with any and that the	b6 b70
that he is acquainted relationship with an photocopy of a letter and said that one occasion, while	United States Senatored with CRANSTON, but my United States senator, dated May 4, 1988 at he had an accident in the subway betwee all, and that he and	has absolute tor, and signed al meeting win other parts	ely no was shown a by ALAN CRANSTON, ith CRANSTON on of Washington,	b6 b70
Investigation on 9/3/91	at <u>Decatur, Illinoi</u>	S File #	SI 58C-PX-41605	
_{by} SA	ksy	Date dictated	9/5/91	ь6 ь70

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DWAYNE ANDREAS

SI 58C-PX-41605 2

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SI 58C-PX-41605 BDS/ksy <u>1</u>

The following investigation was conducted by Special
Agent (SA) at Decatur, Illinois:
On August 22, 1991, ARCHER DANIELS MIDLAND COMPANY (ADM), 4666 Faries Parkway, advised that he assists in the administrative process of making contributions as authorized by said that he recalled the organization AMERICAVOTES and thought it was associated with the White House and was supported by President REAGAN.
explained that all contributions made are maintained on the ADM computer files attempted to find the contribution to AMERICAVOTES in 1986, but was unable to. was furnished with the names AMERICAVOTES, VOTE AMERICA, the CITIZENS PARTICIPATION PROJECT: THE MISSING HALF, and USA VOTES advised that he would search the computer for entries made regarding these organizations.
On August 28, 1991, SA received a computer printout regarding donations made by ADM via United States mail from

b6 b7С original sent 10HQ 8/5/95

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FBI - PHOENIX

FEDERAL BUREAU OF INVESTIGATION

		Date of transcription	9/12/91	
interviewed at the Suite 475. ad	white male, BASS SECURITY OFFI vised that his mai	born CE at 6000 Western n office is 201 Mar	was Place, in Street,	ь6 ь70
attorney identity of the int contacted in regard and matters relatin CRANSTON and others	telephone erviewing agents a s to an investigat g to contributions	and that he was being ion of Senator ALAN	of the ng N CRANSTON	
been involved with California but that	the two primary pwas actually the of the esides these two,	MERICAN SAVINGS (AS) Dersons involved were lead man in the AS E firm WILLIAM AND C	ce JENSON,	ь6 ь70
paid courtesy calls	on two or three or representatives in embers of the bank h Senator CRANSTON him, mainly with formed of the states went out under n by others on his CRANSTON but member nator CRANSTON's series on the states of the	Washington who were cing committee. He washing and also engaged the emphasis of keets of the negotiation signature but staff. Staff	tor te had a few in written ping ions. were arily lealt with	b6 - 5 - 5 - 5 - 5 - 5 - 5 - 5 - 5 - 5 -
pleasure" that CRANSTON never prom interest in the wel CRANSTON was intere employees on the pa	was interested in ised anything spector of the empore sted in please places.	oloyees of AS. Sena age to keep the 2,00	senator ssing an ator 00 AS	
Investigation on 9/11/91	at Fort Worth, 5		C-PX-41605 ~	Б6 ь70
by SA	smf	Date dictated9/:	11/91	

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 FD-302a (Rev	11_15_02)	
1 D-302a (RCV	. 11-13-63)	
58C-PX-4	11605	
Continuation of	of FD-302 of	b6 b7
	CRANSTON never mentioned speaking with anyone on their behalf during his contacts with Senator CRANSTON or during this transaction. Senator CRANSTON's focus was mainly inquiring as to how was doing on putting the deal together. It was obvious Senator CRANSTON wanted to be knowledgeable of the situation. is aware of nothing Senator CRANSTON did to facilitate that transactions and specifically knows of no discussions CRANSTON may have had with the Federal Home Loan Bank Board (FHLBB) or anyone else, in any effort to help them. said that he is unsure, in that he does not really know, whether he actually needed Senator CRANSTON's help or not in order to finalize his purchase. He knows that he did not ask Senator CRANSTON to do anything for them but he admitted he can not answer the question of whether anyone on his staff may have asked CRANSTON or anyone on his staff to assist them. In any case he does not know of any such request.	
	Senator CRANSTON did not solicit any contributions for anything and specifically not for any committee or any campaign. No one asked him on Senator CRANSTON's behalf to contribute to anything. There was no hint that anything could be done to help them if any contribution was made.	
•		b6 b7
-	does not know and has never heard of	b6 b7

the CENTER FOR PARTICIPATION IN DEMOCRACY but he is aware of an

organization by the name of SOUTHWEST VOTERS REGISTRATION

PROJECT (SVRP) .

58C-PX-41605

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Continuation of FD-30	2 of				, On	9/11/91	, Page	3
reco Sena CRAN frie	mmende tor Li STON, nd.	conting back to did it to him LOYD BENTSON as well as has conganization	before a and hav spoke h DIANE FI ntributed	ve spoken h nighly of i EINSTEIN wh	eral peopling in the second se	le have it. Specia ator ALAN a personal	fically	
orga	nizat	In regards	to Senat	tor CRANSTO	N speaking	g highly of	î the	
CRAN	STON 8	asked him to	o conside	er helping	that organ	nization ar	nd	
was soun exis duri came was work him	alread to [tant : ng sma up in along " and to con	that he "almost the conversion, if any consider: like Solution like Solution in the conversion the conversion, if any conversion, if any conversion, if any consider in the conversion in the c	ing helpi enator CF that ord He said t esation k of the fa ny of hel CRANSTO	ing them at RANSTON was ganization, that he can out his bes act that the lp". CRANSON did not	that times aware of but this not exact trecolled by the SVRP does not be discuss him	e. It did his alread comment was all say how tion is the say directly of directly the say of directly the say of directly the say of	not ly as made w this nat it ood w ask	
gire Sena he h foun expl Rio U.S. the dise	ctly tor Blad his d the aining Grande to So Hispan	nd he knows to their hea ENTSON. Who s staff do organizatio g that the e area of So outhern Call	that any adquarter on this of the dilation to be organizate outh Texalifornia. Ty with pay also	rs in San A organizatio igence" on well run a tion works as across t He believ people who file law su	cions he maintonio and on was reconthe organizate to registe the souther would other would other control of the souther would other controls.	nde to there is not through the content of the cont	m went lgh . him, He pport, in the the ily in	
subs with cont late this figu	equent Senat ribut: r abou was d	When Senatedy in the posterior CRANSTON ions and Senator mentions are ever districted to Senator	rocess of ion to the visit requestion of the contractions of the contractions of the contraction of the cont	f doing the hat organizestANSTON neves. He can enator CRANwith him.	due dilication had made subser followed recall on STON, and He was not	gence and he nothing to equent and as ty one time no dollar asked to	nis o do sked e when send]

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. Continuation of FD-302 of		, Or	n 9/11/91 , Page
AMERICA (directly 1984.	FCA) was the form with the Federal	er parent company of a government who took A	AS, but dealt S from FCA in
Democration this organizate fund raise CRANSTON	Half" and does not compare the heard of the Compare to connection with a connection with a connection and he is tot or anyone regardifies has he he met her on one cions or offer anyone results.	eard of an organization trecall CRANSTON ever aign Committee although. He has never hear mmittee for Democration Senator CRANSTON regally unfamiliar with as had no discussions no "soft money" and heard of cocasion. She did no help from the government	r mentioning the gh he has heard of rd of Consensus. He arding any other any Super Bowl with Senator as never heard of and in fact ot discuss any
discussion GLENN, JO direct consolicitate from the anything explained oversight required direct romember of CRANSTON not have.	ersations with him ons he may have had the MCCAIN or DONA ontact with them a cions of money by Federal governmen of him in connect that the banking to he dealt direct the banking commentalking to anyone the also comment	ow CHARLES KEATING and was asked regard with Senators DENNI LD RIEGLE. statement of them. He statement of them. He statement of them. He statement of them appoints to with the purchase committee has no role is purchase, and no coly with the FHLBB and ON had in the purchase on his behalf, although the control of that anything CRANTIES on the banking control of the	arding any S DECONCINI, JOHN ed he has had no or indirect ed that no one ed, has asked of AS. He e other than ommittee vote is knows of no e, except as a heard of Senator ugh he may or may STON did may have

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	TRANSMIT VIA: ☐ Teletype ☐ Facsimile ☑ AIRTEL	PRECEDENCE: Immediate Priority Routine	CLASSIFICATION: TOP SECRET SECRET CONFIDENTIAL UNCLAS E F T O UNCLAS	
			Date 9/12/91	ļ
1	78/12 :	SAC, LOS ANGELES (58C-P)	K-41605) (SARA)	
2	FROM :	SAC, DALLAS (58C-PX-4160	05)(FWRA)(P)	
3	SUBJECT :	ALLEGATIONS CONCERNING U	J.S. SENATORS	
5		DENNIS DEĆONCINI, JOHN GLEŃN,	•	
6		JOHN MCCAIN, DONALD/RIEGLE;		
7		CHARLES H. KEATING, JR, DBA LINCOLN SAVINGS AND	LOAN ASSOCIATION,	
8		IRVINÉ, CALIFORNIA, AND AMERICAN CONTINENTAL	CORPORATION,	
9		PHOENIX, ARIZONA; CORRUPTION OF FEDERAL PU OO: PHOENIX	, JBLIC OFFICIALS-LEGISLAT	TIVE;
10		OO: FROENTA		
11		Re Los Angeles teletype	to Dallas, ET AL, 8/15/	/91.
12	convert an	Enclosed for Los Angeles FD-302 with interview no		
13	with		Fort Worth, Texas. Encl	
14	TOT PHOENTS			. .
15 16	during the	attorney interview reflected in tesearch company records t	who was presche enclosed FD-302, adv	<i>r</i> ised
17	contribution	on to U.S.A votes, as well be pertinent to that in	ll as any other records	
18		The post of the transfer of th	58C-Px-41605	5-01
19		reles (Enc.3)	serialized)	<u>C</u>
20	2 - Dallas CBB/smf	(=====================================	SEP 26 1991	
21	(6)		FBI — PHOENIX	1

Approved: _____ Transmitted _____ Per ______

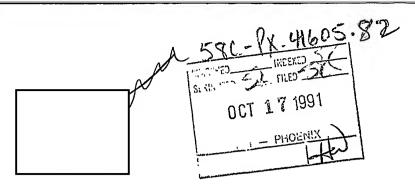
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LEADS:

DALLAS DIVISION:

AT FORT WORTH, TEXAS:

Will maintain contact with Attorney telephone in order to obtain and review any records produced reflecting contributions of



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FEDERAL BUREAU OF INVESTIGATION

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Aven	et, New Yo	Also pres orney, WA Y 10171-	GOLD NY, wa ent for CHTELL, 0149.	MAN SA s inte the i LIPTO he nat	rviewed ntérview N, ROSEN was advi ure of t	& KATZ sed of the inte	, 299 : the ide	or Park	
	sent. In	1985,	was	\neg	respons	from 1	985 to	the]]
Demo	ocratic pa ressed to k a week o	rty fund-	In 197 raiser. a desir	intr The te to g	oduced introducet	on his to ction ca ve in po and th	me aft	er	ith
note of 1 Fina if 1	ed several the Democr ance Chair he had a t	became fund ratic Cong man for V	e very a ising ac gression	ccompli nal Can MONDALI	shments mpaign D E. and a	THREE. A	ng 198 .984 Ne he was	w York not su	man
was	unusual. [active ir allenge of acerned abo	the Demo	politica ocratic ating i	al root Party n pres:	ts come in Broo idential	cambard	s grand	njoys t	MIIO
CRA	ANSTON but	-	t sure t to kn	of the ow CRA	exact d	late he r	met Ser e perfo	nator AI orming h	LAN nis
									_
stigation on	n 9/17/9	91	New	York,	New Yor	rk File	# <u>58C−1</u>	PX-41605	<u>-</u>

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Continuation of FD-302 of . , On 9/17/91 , Page 2	b6 b7C
duties as the Dinner Chairman in 1982. CRANSTON was the most active senator in assisting fund-raising for the Dinner.	
stated that since 1982, he gets a call at least once a year from CRANSTON for a contribution to his or a colleague's campaign.	
In February, 1988, traveled to Washington, DC, to lobby approximately eight senators on a Banking Bill. may have lobbied with of GSC's Washington office and The proposed Banking Bill would have adversely impacted GSC by negating the law created by the Glassteagal (phonetic) Legislation of the 1930's. Glassteagal, according to keeps commercial banks and investment banks in separate lines of business GSC does not want GLASSTEAGAL repealed or superceded because commercial banks would enter into GSC's line of work.	b6 b7C
had CRANSTON on his list of senators to lobby but did not get to see CRANSTON on that day in Washington, DC, in February, 1988. may have spoke to an aide of CRANSTON's on the matter, but could not recall exactly whether he did or did not speak to an aide.	b6 b7С
stated that he does not keep a diary and his secretary could not locate his 1988 calendar. secretary did find the 1989 and 1990 calendars.	
recalled making a \$100,000.00 contribution to the Forum Institute in late April, 1988. At some point prior to the contribution and after the lobbying trip to Washington, DC, could not specifically recall the date, CRANSTON came to see to request the contribution. does not remember who set up the meeting. was at the meeting. knows but does not recall if she was at the meeting. Although the meeting may have been in February, 1988, does not recall talking to CRANSTON about Glassteagal and doubts very much that he did talk to CRANSTON about the Banking Bill.	ъ6 ъ7с
recollected discussions about CRANSTON's "get out the vote" campaign and the tax deductible nature of the contribution. intended to raise part of the money and contribute the rest. did not move on the pledge	

58C-PX-41605

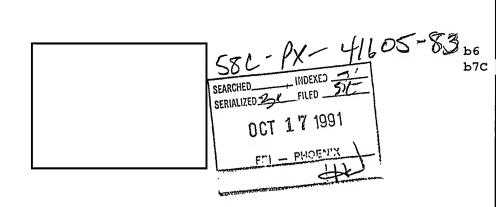
Continuation of F	FD-302 of			· · · · · · · · · · · · · · · · · · ·	. On	9/17/91	_, Page	· 3
·	money. L 1988. It aides to	stated to stated to stated to stated to stated to state t	hat the m	eeting may ut of the	nave k ordinar	peen in Fel	bruary NSTON'	, 's
	Banking l	did no did no did reconstruction did not be	not give t b going ag the contri party and	he contrib elieves th ainst GSC' bution wou strengthe	oution in at CRAN is lobby	alight his	e for' red th ts. statu	a ne ns
	for	CRANSTON and 00 contributi a drink. CR	on. In 1 RANSTON wa	990, CRANS s going to	TON was	s in NY and	d met	11
	requested was not swanted a	About 2-3 we the Federal But to meet surprised that contribution all Candidate.	reau of I	nvestigati]then call s to be in	on (FBI .ed CRAN .terview	() called a NSTON. CRANS Wed. CRANS	and ANSTON STON	ī

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	Date of transcription 9/20/91
(NY), was inte and at his place o the interviewi	SSOCIATES, 237 Park Avenue, New York. New York rviewed by Special Agents (SAs) of the Federal Bureau of Investigation (FBI), f business. After being advised of the identity of ng Agents and the purpose of the interview, he ollowing information:
management fir	ce 1976. JENNESSEN ASSOCIATES is a pension m responsible for \$10 billion in equities for sixty clients and \$8 billion in fixed income r approximately twenty-five clients.
are related to	informed that none of his political contributions JENNESSEN ASSOCIATES nor any business interests of
standing frien	involvement in politics stems from his long dship with Michigan Senator DONALD RIEGEL, with led Harvard Business School.
DIECET/c nolit	has maintained a close relationship with RIEGEL cal interests and involvement have followed ical undertakings. For instance, yas a publican for years, but because RIEGEL became a
Democrat,candidates.	became a supporter of Democratic causes and
Democrat, candidates.	has made many trips to Washington with RIEGEL, luced him to numerous Democratic Senators, to whom en ended making campaign contributions.
Democrat, candidates. who has introduced has often	has made many trips to Washington with RIEGEL, luced him to numerous Democratic Senators, to whom en ended making campaign contributions. cannot recall exactly when he first met Senator believes it was on such a trip to Washington, with
Democrat, candidates. who has introded has often candidates. CRANSTON, but RIEGEL several	has made many trips to Washington with RIEGEL, luced him to numerous Democratic Senators, to whom en ended making campaign contributions. cannot recall exactly when he first met Senator believes it was on such a trip to Washington, with
Democrat, candidates. who has introduced has often candidates. CRANSTON, but RIEGEL several	has made many trips to Washington with RIEGEL, luced him to numerous Democratic Senators, to whom en ended making campaign contributions. cannot recall exactly when he first met Senator believes it was on such a trip to Washington, with years ago. time in 1987, CRANSTON called and arranged a New York office. Present at the meeting were

58C-PX-41605

Continuation of FD-302 of	, On 9/14/91 , Page 2	ь6 ь6 ь7с
cannot recall. CRANS soliciting funds for presented a choice of	a woman aide to CRANSTON, whose name TON explained to that he was a major voter registration effort. CRANSTON three non-partisan voter registration funds contribute, as well as a partisan, non- ica votes.	
Institute, which was thought affected Virg	ed to contribute \$25,000 to the Forum one of the non-partisan funds, which he inia, as well as \$10,000 to America votes. tributions in 1988 and 1989.	b6 b7С
voter registration ef thought it was import \$25,000 contribution	ibuted, even though many people thought that forts were a waste of time, because he ant for the country noted that a was not unusual for him, adding that he has ibutions as large as \$250,000.	
1992 re-election camp later called HOBBS an to his legal defense.	each donated \$2,000 to CRANSTON's aign, as they had in the past. CRANSTON dasked permission to convert the donation HOBBS agreed.	ъ6 ъ7С
ASSOCIATES had any re	d that neither he personally nor JENNESSEN gulatory, legislative, or business matters ald or did act, nor on any that he asked him	

			FBI				
□ T □ F	NSMIT V eletype acsimile AIRTEL		PRECEDENCE: Immediate Priority Routine	CLASSIFICA TOP SEC SECRET CONFIDE UNCLAS UNCLAS	RET ENTIAL E F T O		
				Date 10	0/10/91		
TO			SAC, LOS ANGELES (58C-PX- ADIC, NEW YORK (RUC)	-41605)			
(1)	3JECT		ALLEGATIONS CONCERNING U. ALAN CRANSTON, - ET AL; CFPO; (OO:PX/LA)	s. SENATORS			
		2 ′ s	ReLAteletype to CI, dated Enclosed for LA are an or detailing interviews of and interview notes.	ciginal and o			ъ6 ъ7с
			This matter is RUC.				
2	- Phoe: - New	nix	geles (Encls.) (Encls.) k				,
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FEDERAL BUREAU OF INVESTIGATION

		Date of transcripti	on 9/4/91	
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(SAs) of the Federal Burea	one East Fourth Street of the official ident au of Investigation. In his mid 70s and his interview, and provide	t, Cincinnatities of Special Cincoln C	cial Agents sinnati Office white male advised of	
casual basis for mar	own United States Ser ny years based upon p semi public functions ends.	assing conta	cts at	
occasion to contact	e nor to his knowledg CRANSTON or his staf regulatory matters re	f with regar	d to	
	owledge, neither CRAN ressure or otherwise ributions.			
contribution by checomany 26, 1988. This political contribution the money would be a registration objection INSTITUTE was associunt and the solici	cknowledged that AFC ck to the FORUM INSTI was considered by ton inasmuch as it wastilized for "get out ves. It was his undested with US Senator ecified way. He obtait that ion to contribute female associate of S	TUTE on or a to be s his unders the vote" verstanding t ALAN CRANST ined his inf	bout a soft money standing that oter hat FORUM ON in some ormation M INSTITUTE	b6 b7С
He does no	ot recall any contact	s with or kn	owledge of	
	,			
				•
nvestigation on 8/26/91	at Cincinnati, Ohio	, File #	Cincinnati	
	and		58C-PX-41605	
<u></u>	crm	Date dictated	8/29/91	

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CI 58C-PX-41605

Continuation of l	D-302 of	, On	8/26791	, Page	2b6
	commented that he and/or A approximately 10 to 15 solicitations per day and/or donations.			ions	
	Initially, referred to the at AFC which concerned political contribution immediately made a substitute to locate such a funsuccessful. then stated that such a file did not exist. He further stated record maintained of political contributions canceled checks.	ns ma state ile h he wa d tha	de by AFC ment to ad been s mistaken the only	and/or	ь6 ь70
	authorized and agreed agreed agreed and agreed of the canceled check utilized to make the \$5 contribution to the FORUM INSTITUTE on or about	25,00			ь6 ь70
	adamantly denied that his of the force of th				

TRANSMIT VI Teletype Facsimile AIRTEL	·	PRECEDENCE: Immediate Priority Routine		SIFICATION: OP SECRET ECRET CONFIDENTIAL INCLAS E F T O	
			D	oate 10/15/91	4
TO	: SAC, LO	s angeles			
FROM	: SAC, CI	NCINNATI (58C-	PX-41605)	(SARA) (P)	
SUBJECT	ALAN CRA	ION OF FEDERAL FIVE			
Los Angel	ReLAtel les, dated		dated 8/	15/91, and CItel	to
dated 8/2	Phoenix,	two copies of a cerning caption	n FD-302 (original and one of ts ALAN CRANSTON	
\$25,000.0 enclosed	FINANCIAL 00 dated o	CORPORATION to n or about 5/26 incinnati will	the FORUM	anceled check fr M INSTITUTE for roffered in the ame to Los Angel	
$\frac{2}{2}$ - Los $\frac{7}{2}$ - Phoen 2 - Cinci	Angeles (Sa nix (Encl. Innati	ARA) (Encl. 2) 2) 今ら			
EAV:krm (6)	•			SEARCHED INDEXED SERIALIZED FILED	<u>005</u> -8
. -				OCT 18 1991	-
•		1*		FBI - PHOENIX	<u> </u>
Approved:		Transmitted		Per	

(Number)

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(Time)

58C-PX-41605-87

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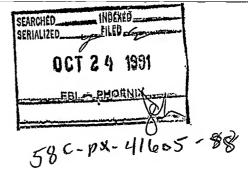
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FEDERAL BUREAU OF INVESTIGATION

	Date of transcription 10/17/91
	alifornia. DOB was located and interviewed at his ffices, Tiburon, California. At the time of the nterview, was advised of the identity of the interviewing gent by being shown his credentials and was told the agent esired to discuss with him two contributions he made to the enter For Participation in Democracy (CPD) totalling \$40,000.
	advised that both contributions made to the enter For Participation in Democracy were made voluntarily and fter a discussion with his wife. He stated he has known Senator RANSTON for a number of years and was aware of this Center in hat it increased the franchising process and used monies donated o it to increase the number of registered voters in California ithout regard to how they registered. He stated he and his wife elieve that just by expanding the number of voters in California hey are assisting the democratic process.
	He said CRANSTON had asked them to support the ranchising process and they were happy to do so. He stated he as never asked for, nor received assistance from Senator RANSTON or any other senator. He feels his contributions were art of participating in the democratic process which exists in he United States.
	According to his business is such that there ould be no need for a senator or any Federal representative to ssist or offer him favors. He advised he is in the reinsurance usiness and his business is not regulated by Federal law.
	said he feels the Federal campaign funding laws re "screwed up" and the rule which allows individuals to place s much money as they wish into their own election, leads to a overnment led only by the wealthy. Because of this he feels we nust increase registration and the number of voters who turn out t each election. stated Senator CRANSTON personally asked im to donate after they met at a gathering of democratic enators at a Democratic Senatorial Campaign Committee function. Se said this gathering of "The Majority Trust" which is a
Inves	ation on 9/27/91 at TIBURON, CALIFORNIA File # 58C-PX-41605
by _	A mdh Date dictated 10/16/91
	4 **

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FD-302a (Rev. 11-15-83	3)					-
58C-PX-41605						
Continuation of FD-302	of			, On	9/27/91	, Page <u>2</u>
		,				•
atten	ection of the D nded by himself ering where the	and his wife	. He said	it was	at this	was
Senat	con under any pres or CRANSTON an idates, both Re	d in fact he	idation to and his wi	make c fe cont	ontributio	ns to
ended	The inter d at 6:18 p.m.	view which beg	gan at app	roximat	ely 5:30 p	•.m.



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FEDERAL BUREAU OF INVESTIGATION

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Date of transcription 8/30/91	
age 74, Francisco, Califórnia, work telephone was contacted at his place of employment. After being advised of the identity of the interviewing Agent and the nature of the interview, furnished the following information:	٠
has known Senator ALAN CRANSTON socially since the 1960's. first became involved with CRANSTON's fund raising activities when he (CRANSTON) ran for the office of Controller for the State of California. confirmed that he has since contributed approximately \$100,000 to various bi-partisan groups, including The Forum Institute and the "Get out the Vote" program, which were supported by CRANSTON. donated money to these programs because he believed it was important to increase general participation in the election process and to increase voter awareness.	
adamantly affirmed that he never asked for any political or personal favors of CRANSTON or his office, and that CRANSTON never offered anything in return for his contributions. SWIG believes that CRANSTON is a competent and honest politician, and he reiterated that there was never any "quid pro quo" or nexus between SWIG's contributions and CRANSTON's subsequent actions.	
knows Senator and Mrs. DENNIS DECONCINI quite well socially. The DECONCINI's are independently wealthy and therefore, has difficulty imagining why DECONCINI would do anything illegal or unethical to raise campaign funds.	
	- Accepted
Investigation on 8/30/91 at San Francisco, California ile # 58C-PX-41605	_
by SA Date dictated 8/30/91	

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FBI

	TRANSMIT VIA: ☐ Teletype ☐ Facsimile ☒ AIRTEL	☐ Immediate ☐ TOP S ☐ Priority ☐ SECRI ☐ Routine ☐ CONF	ECRET ET IDENTIAL AS E F T O
		Date	10/17/91
1 2 3 4 5 6 7 8 9 10	TO : FEMALE: SUBJECT :	SAC, PHOENIX (58C-PX-41605) SAC, LOS ANGELES (58C-PX-41605) SAC, SAN FRANCISCO (58C-PX-41605) (ALLEGATIONS CONCERNING U.S. SENATOR ALAN CRANSTON, DENNIS DECONCINI, JOHN GLENN, JOHN MCCAIN, DONALD RIEGLE; CHARLES H. KEATING, JR., dba LINCOLN SAVINGS AND LOAN ASSOCI Irvine, California; AMERICAN CONTINENTAL CORPORATION, Phoenix, Arizona; CORRUPTION OF FEDERAL PUBLIC OFFICE LEGISLATIVE; OO: PHOENIX/LOS ANGELES	S ATION,
12	dated Augus	Re Los Angeles teletype to San Franst 15, 1991.	cisco and others
13 14 15	one intervi	Enclosed herewith find copies of two one interview at San Francisco with iew in Tiburon, California with otes of the interview are encl	The
16 17 18	remains in considered	In view of the fact that no further the San Francisco Division, this caruc'd.	
19 20 21		geles (58C-PX-41605) (Encls 2)	SEARCHED INDEXED SERIALIZ FILED PHOENIX
	Approved:	Transmitted (Number) (Time)	Per

b6 b7C

Memorandum



Date

10/4/91

To : DIRECTOR, FBI

(ATTN: PCU, ROOM 3849)

From : SAC, PHOENIX

Subject: VERIFICATION OF FD-761

BUDED: 10/4/91

Pending investigations for which an FD-761 has been submitted:

<u>00</u>	FILE #	DATE OPENED	LAST UPDATE	DATE CLOSED
PX	12C-PX-44826C	5/24/91	6/3/91	9/1/91
PX	56D-178C	1/4/89		6/2/89
PX	58A-PX42406C	4/13/90	8/13/90	10/4/91
PX	58A-PX-42524	4/24/90	7/5/91	
PX	58A-PX-43152C	8/20/90	8/21/90	2/7/91
PX	58C-PX-41605	11/8/89	8/7/90	• •
PΧ	58C-PX-44028	1/11/91	8/7/91	•
PX	58C-PX-44193	1/31/91	6/13/91	
PX	194A-PX-42242	2/7/89	8/9/91	
PX	194B-PX-41619	11/15/89	9/4/91	
PΧ	194C-PX-45446	9/5/91	9/5/91	
PX	58A-PX-41265	8/20/91	8/23/91	
PX	58A-PX-45288	8/8/91	9/13/91	
PX	58A-PX-45429	9/3/91	9/25/91	
PX	194A-PX-45602	9/27/91	9/27/91	

2 - Bureau 1)- Phoenix HMW:sla Row do co the

58L-fx-41605-90

SEARCHED_____INDEXED______
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OCT 4 1991\

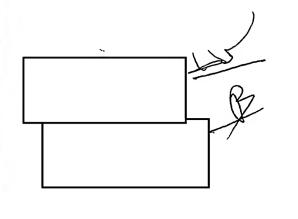
FBI - PHOENIX

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PENDING INVESTIGATIONS - NEED UPDATED FD-761'S'

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'FOFILE#' 'DATE OPENED'
012C-PX-44826 C 9-1-95/24/91
  FO'
               'FOFILE#'
                                               'LAST UPDATE'
  PX
                                                       6/03/91
               056D-178 C 6-2-89 1/04/89
  PX
               058A-PX-42406 C
                                                      8/13/90
-5/21/90 FD 761 dated 7-5-91
8/21/90 —
  PΧ
               058A-PX-42524 4/24/90
058A-PX-43152 2 2-7-9/8/20/90
058C-PX-41605 11/08/89
  PX
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7/11/91-FD761 Lated 8-7-91
                                                       8/07/90
               058C-PX-44028 U
058C-PX-44193 U
194A-PX-42242
                                   1/11/91
 PX
                                   1/31/91
                                                       6/13/91
                                                      -8/14/90 =D 761 dated 8-9-91
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                                   2/07/89
             194B-1x-41619
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             1940-PX-45446
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                                      8-20-91
            58A-PX-41265
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           58A-PX-45429
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           194A-PX-45602
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<u>CLASSIFICATION</u>

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PROUTINE	O CONFIDENTIAL	NUMBER OF PACES 4
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	Ø unclassifted	
w: FBI Photh		BATE: 11114161
FACSIMILE NUMBER:	(012)279-551	1
attn:		A SECTION OF SECTION S
FROM: FBI LOS	Anaeles	Transconnection of a proposition of Abertain Action - Proposition
	hous Concerning	U.s. Senators
Alan (transton, ET A	·L.
	hoenix Los Pm	
SPECIAL HANDLING IN		HAMD CARRY TO
with all the later		
OF IGINATOR'S NAME:	SA	
ORIGINATOR'S ENCIMI	LE NUMBER: (714	1 542-8835
APPROVED:		
* *		

FBI

TRANSMIT VIA: Teletype	PRECEDENCE: Immediate Priority Routine	CLASSIFICATION: TOP SECRET SECRET CONFIDENTIAL UNCLAS E F T O UNCLAS	
		Date 11/14/91	
FM FBI LOS ANGELES (5	6C-PX-41605) (SARA-3) (P)	
TO DIRECTOR FBI/ROUTI	NE/		
FBI WMFO/ROUTINE/			
INFO FBI PHOENIX/ROUT	INE/		
BT			
UNCLAS			
CITE: //3410:0670//			
PASS: FBIHQ FOR SSA	pı	UBLIC CORRUPTION UNIT.	
	FEDERAL PUBLIC LES (58C-PX-41) L HOME LOAN BAI COLN SAVINGS AI N OF FEDERAL O	NK BOARD; CHARLES H. ND LOAN, IRVINE, FFICIALS - EXECUTIVE	
JAJ/UM Approved: Olf/G	G Original fil	lename <u>:</u>	
Time Received:		ilename:	_
MRI/JULIAN DATE:		ISN:	_
FOX DATÉ & TIME OF ACC	CEPTANCE:		

^PAGE 2 56C-PX-41605, UNCLAS
RE TELCALLS FROM SA TO FBIHQ SUPERVISOR
AND WMFO RELIEF SUPERVISOR ON
11/12/91.
AS DISCUSSED IN REFERENCED TELCALLS, LOS ANGELES SA'S
INTEND TO TRAVEL TO WMFO
11/19/91 THROUGH 11/23/91, FOR THE PURPOSE OF CONDUCTING
INVESTIGATION IN CAPTIONED MATTERS.
ON NOVEMBER 21 AND 22, SA'S ALONG WITH
AUSA AND DOJ ATTORNEY STUART GOLDBERG, ARE
SCHEDULED TO REVIEW THE NON-PUBLIC DOCUMENTS OF THE U.S.
SENATE ETHICS COMMITTEE. THE ETHICS COMMITTEE HAS PUBLICLY
RELEASED 15 VOLUMES OF DOCUMENTATION, BUT APPARENTLY HOLDS
DOCUMENTATION THAT HAS NOT BEEN RELEASED TO THE PUBLIC. THIS
REVIEW WAS INSTIGATED AND ARRANGED BY AUSA
ON 11/20/91, SA'S ARE SCHEDULED TO
INTERVIEW SUBJECT OF ATLANTA, GEORGIA AT THE
OFFICES OF HIS ATTORNLY, SWIDLER AND BERLIN,
3000 K STREET, NORTHWEST, WASHINGTON, D.C. AUSA
INTENDS TO ATTEND THIS INTERVIEW.

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NO ASSISTANCE OF WMFO IS REQUIRED. SAC WMFO AND SAC LOS ANGELES CONCUR WITH PROPOSED TRAVEL.

HT

FBI

CLASSIFICATION:

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	TRANSMIT VIA: ☐ Teletype ☐ Facsimile X AIRTEL	PRECEDENCE: Immediate Priority Routine	CLASSIFICATION: TOP SECRET SECRET CONFIDENTIAL UNCLAS E F T O UNCLAS
			Date 10/30/91
1	TO :	SAC, LOS ANGELES (58C-PX	(-41605) (SARA)
2	FROM :	SAC, DALLAS (58C-PX-4160)5) (FWRA) (RUC)
3	SUBJECT :	ALAN CRAŅSTON,	J.S. ȘENATORS
5		DENNIS DÉCONCINI, JOHN GLÉN, JOHN MCCAIN,	
6		DONALD RIEGLE; CHARLES H. KEATING, JR,	
7		dba LINCOLN SAVINGS AND	LOAN ASSOCIATION,
8		IRVING, CALIFORNIA, AND AMERICAN CONTINENTAI	CORPORATION,
9			JBLIC OFFICIALS-LEGISLATIVE;
10		OO: PHOENIX	
11		Re Dallas airtel to Los	Angeles, 9/12/91.
12		On 10/23/91,	attorney for
13 L	advi:		records and uncovered no coup inquired about, besides
14	SOUTHWEST	VOTERS REGISTRATION (SVR)	
15	year periodabout \$250	d, in the range of \$25,00	00 to \$100,000, totaling
16	42046 4250	,	
17	2 - Los And 2 - Phoeni		
18	2 - Dallas		
19	CBB/smf		FOR D. 411 1-09
20			58C-PV-41605-92 SERIALIZED_ INDEXED_ 56
21		1*	
			NOV 1 2 1991
			FBI — PHOENIX
	Approved:		Per



581-PX-41605-93

DEC 4 1551

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FEDERAL BUREAU OF INVESTIGATION

	note the second	ř
	Į.	Date of transcription 8/26/91
interviewed at his place Anaheim, California, to been advised of the interview,	ce of business, 1045 elephone: erviewing agent's id	After having entity and the nature
1987, from described as one of fix to CRANSTON, and who have with CRANSTON's office,	to ALAN CRANSTON, ive individuals who have "cases or legisla, and who "rightfully id he had not seen the	d been "very helpful" tive matters" pending
cranston in Orange Courapproximately \$15,000 rexplained that although \$15,000, it was possible said the event was attained viduals, some of which persons who had done by contributed to CRANSTON prescribed by law. fundraising function for	for CRANSTON's campain he thought that thing he it raised as much ended by approximatel nom were his employeed usiness with him. I's campaign himself added that he atternal he agreement to the company of the campaign and the campaign and the campaign and the campaign himself added that he atternal he agreement to the campaign and the campaign	s event raised gn. later s event raised only as \$30,000. y 20 or 25 es, and some were said he within the limits eended a separate
government contracts to cruisers, and a competer provided the power equal learned TELEDYNE was long to provide power ecompany had no such long to the company had no such long the company the company had no such long the company the company had no such long the company had no such long the company had no such long the company the company had no such long the company the company had no such long the company the company had no such long the	itor, TELEDYNE, had to import for other ship obbying Congress and equipment for other sobying. In response his own "white paper" said ANSTON and PETE WILSO Mayors of Anaheim a ervice Committees. It just had him meet we service" from WILSON istened to sefore he approached	ment for certain Aegis the contract to said he the Secretary of the ships, and to TELEDYNE's and took it to anyone he approached No, his Congressman and Fullerton, and said WILSON would with aides. soffice. On the cory. said he
Investigation on 8/6/91	at Anaheim, Californi	.a File # 58C-PX-41605
by SA dcd	I	Date dictated 8/7/91

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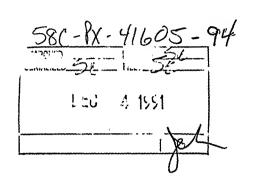
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Continuation of FD-302 of	, Or	n 8/6/91	_, Page b7C
do so. explained because his lawyer was with his lawyer. between the fundraising did not feel unce added that most of the fundraising event, because to the problem of a smathis fundraising event sponsored.	asked him to hold necked with his lawyer, and it that he checked with his also a friend, and he checked said he did not "sense" and event and CRANSTON's help of CRANSTON's help came before event. explained the conformal of the conformal explained the conformal conformal explained the conformal	then agreed the lawyer only ked everything my connection for an araising event ore the request to hold the him and lister and lister one he ever ntributions to	g to g nd st ned
office in 1987 regarding the division that had to 1987, and the sale was with dealing with the control of the c	had ongoing conversations of his problem with the Naverhe contracts with the government of the division to ask CRANSTON's office for	y. sold rnment in July becoming fed what was sold was sol	d Y, up
letters and probably maprimarily to the Secret also had dealings with possibly others whose met only only only only only only only only	of CRANSTON's names he could not recall. on one occasion in Washington if he would host a fundrais not recall the location of said it would have been eit at a dinner meeting. The fundraising event that did not remember discussing unless she was involved in phone calls on the beat was on CRANSTON's inguish between CRANSTON's	behalf, ated that he soffice, and said he on, D.C., whice sing event for his meeting her in added that he hosted. his navy n writing the alf.	e ch r

ontinuation of FD-302 of	, On 8/6/91	, Page b6 b7C
requests from contributions to any ot Democratic Party, to CR		or for vas to
CRANSTON was hosting the added that he also was chance he had, de wilson and his good expression to know whether		very ator ne did
the Navy as set forth in January 2, 1987, is according in accuracy is that LITTON INDUSTRIES, as a sinaccuracy is that advantage was based on because TELEDYNE was a with the navy.	curate except for two points. One su competitor was TELEDYNE rather t stated in the memorandum. The other	dated b7C nch chat only cacts ining
advised	that he is a Republican.	





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FEDERAL BUREAU OF INVESTIGATION

Date of transcription 8/23/91
date of birth:
Santa Monica, California, was interviewed in the presence of his attorney, HELLER, EHRMAN, WHITE, AND MCAULIFFE, 601 South Figueroa Street, Los Angeles, California, (213) 689-0200. After having been advised of the interviewing agents' identities and
the nature of the interview, provided the following information:
advised that Senator ALAN CRANSTON's campaign for reelection to the United States Senate in 1986. by CRANSTON on the Saturday before Christmas in 1984, and he began the job in February 1985. said he completed his employment in early 1987.
advised that
in Washington, D.C., where he
handled constituent service. He then worked for a quasi government agency in Washington D.C. before moving to Los Angeles to practice law.
stated that he had minimal involvement in fund raising for two reasons. One reason was that CRANSTON was in Washington, D.C. while was in California, and the second reason was that did a good job of fundraising and did not need supervision. said his main focus
advised that in 1986, he knew LINCOLN SAVINGS AND LOAN ASSOCIATION (LSL) was in a battle with the FEDERAL HOME LOAN BANK BOARD (FHLBB), although was unsure how he knew this, and he speculated that he learned this from newspaper accounts. Said he could not recall discussing the LSL/FHLBB battle with although he may have.
stigation on 8/5/91 at Los Angeles, California File # 58C-PX-41605
SA dcd Date dictated 8/7/91

Continuation of FD-302 of		, On	8/5/91	Page _	-2
and than situati occurring	on with	ct with CRANSTON's staff was did not speak with any staff me said he did not discuss the added that as rned about the political effect campaign, and he had no specificussions of possible political with LSL or CHARLES KEAT	ISL/FHLBB s t of events ic]	
had lot until 1 want to had a deassured before that the and that the to CRAN no necesspending to borre	nent in the prison of cash in the ate in the camp go into debt debt from his like the election, the election, the election at a more money not been original STON and said the sity to go into was necessary ow money, which	on the 1986 campaign because CF 984 Presidential campaign, and he would not go into debt. A the campaign media consultants showed that it would be a closeded to be spent on television	the campaign cash problems STON did not RANSTON still had few weeks told se election, advertising there would k had said the		
could no and he calthough because starr representations to a the temporary could not be although the temporary could not be a	er of CRANSTON ot recall who s does not know were those two were recalled having egarding the pastructure the	and otherwise active in political suggested DEAUVILLE as a potent who arranged the loan with DEAU lated that it was CRANSTON or so most directly involved in furging contact with someone on the Experwork for the loan, including the DEAUVILLE loan, and are done so.	ial lender, VILLE. Idraising. DEAUVILLE Ing possibly all discussing		

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Continuation of FD-302 of	, On_	8/5/91	_, Page b6 b70
very close. said for provide enough money to do was concerned that	the campaign may be a liinggested to CRANSTON or to cap letter of credit in cap	IIIE loan wou nts wanted, k ttle short of that	uld but f
Tuesday through Monday adverse payment in full on the Thuweek. Thus, to purchase a campaign, the money would	rsday before the first To dvertising for the last to be needed by Thursday, Oc ast minute television con emplated that the back up	they require uesday of the week of the ctober 23, uld be arrand p line of	e
lender to the campaign. he was involved in the loa	in negotiations or arrange all the exact timing of thought that it would he	recall whethe ements with the LSL line ave happened	of
DEAUVILLE loans confident: eventually. did no the campaign was borrowing have been such a concern no problem with borrowing as to DEAUVILLE. disagreement with the FEDI but then had no kno	ot recall any need to keep from the media, although the campaign. In the campaign. Money from DEAUVILLE or generally recalled ISL has been provided as a second control of the could not recall added that he had to the ISL line of credit	ll be reporte p the fact the h there could said there wa LSL, especial ving a public N FRANCISCO, involved in discussing no knowledge	ed hat d as lly c

Continuation of	FD-302 of, On <u>8/5/91</u> , Page <u>-4-</u>
	said he had no knowledge of any desire or instruction to destroy the line of credit documents at either ISL or the CRANSTON campaign. said he had no knowledge that had requested that the LSL line of credit documents be destroyed to prevent or someone else in the campaign from drawing on the line of credit.
	said he did not recall talking with anyone at LSL, although he could have talked with someone at LSL regarding the line of credit. said he has never met or talked on the telephone with KEATING, explained that he was always looking for problems in the campaign, and he did not remember the LSL letter of credit ever being considered a problem. said he could not recall having any discussion with or anyone else regarding anything CRANSTON had done for LSL. said he did not recall being aware that LSL had requested help from CRANSTON's office. added that it would have raised a red flag if had told him that she discussed legislation and the letter of credit with in the same conversation. added that he was not surprised that LSL issued the letter of credit, because CRANSTON had good relations with many financial institutions.
	said he knew of no individual who had helped CRANSTON in his campaign, and who also had problems pending before CRANSTON's office. said he knows of no "special favors" done by CRANSTON for any contributors. explained that he recalled that the issue of deregulation of the SAVINGS AND LOAN ASSOCIATIONS was current in 1986, but considered this a policy question, and not a particular constituent service question.
	stated he was unaware at the time that KEATING contributed \$85,000 to the California Democratic Party in October, 1986. explained that he generally did not know what was going on with the soft money in the campaign, because his responsibilities dealt only with the hard money.

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Continuation of FD-302 of	b6 b7c
never learned how the \$85,000 was raised, and he could not recall any later conversations with CRANSTON or regarding the \$85,000. said he thought he first learned about the \$85,000 contribution by reading about it in the newspaper.	
event, but that had no knowledge of what may have done for CRANSTON, and what CRANSTON may have done for said he is unfamiliar with	ь6 ь7с
concluded that he had no knowledge of any illegal, unethical, or politically embarrassing events that occurred during CRANSTON's 1986 campaign.	
cranston campaign. said he had no communication with anyone at LSL regarding the LSL line of credit in 1986, and that he was not present for the signing of the documents relating to the LSL line of credit.	ъ6 ъ7С



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FEDERAL BUREAU OF INVESTIGATION

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for		Washington, D.		Attorney
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informati	on:	.vebergaeren ana	provided the for.	rowing
fodomolo	According		contributed	\$2,000 to the
election	ampaign or	to refund \$1,000	BEARD lost in the	ne primary BEARD asked
T t	o contribut	e the \$1.000 ref	und to the Delawa	
Democrati	c State Com	mittee (DDSC).	did so.	41 C
			e working for BE	
telephone			ed that something	
happened +		cneck payable	to the DDSC, and le to the Commit	asked
Democrati	.c Consensus		knew to be a pol:	
committee	affiliated	with Senator AI	AN CRANSTON.	did
			for a Democratic	
October 2		has searc	hed his records,	and has been
for a Dem	determine	wnetner this che sensus ever clea	ck payable to the	e Committee
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vestigation on 7/	12/01	" Canta Ama	alifamia E	E00.DV 41.005
Conganon On	12/91	at <u>Santa Ana, C</u>	alliornia File#	58C-PX-41605
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FEDERAL BUREAU OF INVESTIGATION

	Date of transc	ription 9/9/91
ERNEST (no middle name Chairman, ESJ GALLO WINERY, was 600 Yosemite Boulevard, Modesto, entire interview was After having been advised of the the nature of the interview, GAN	interviewed at his California. Prese	place of business, ent during the s' identities and
GALLO stated that he well", and that they have been time to time, GALLO has contributed he met only on Francisco.	friends for at least	ten years. From ampaign. GALLO
GALLO was asked about WINERY contributions to the Ford Participation in Democracy of \$1 1989. GALLO responded that the initially telephoned GALLO and of to get people out to vote and the making an effort to get people to a letter to GALLO from CRANST reference to seeing GALLO at reviewing the copy of the letter CRANSTON fundraising event at the remember receiving this letter. CRANSTON asking for a \$250,000 costated in the letter.	Im Institute and the 100,000 per year in best he could recal described reasons when the there were organ to vote. GALLO was 100 dated May 28, 19	Center for 1987, 1988, and 1 was that CRANSTOR y it was necessary izations that were then shown a copy 87, which makes After alled attending a that he did not e did not remember
GALLO said he could not to groups affiliated with CRANST Party, although GALLO said he material all E&J GALLO WINERY political acleared by the E&J GALLO WINERY Department has maintained record that he contributes both to Demo	ON or to the Califor y have done so. GAI and charitable contr Legal Department and as of these contribu	rnia Democratic LLO explained that ibutions are d that the Legal tions. GALLO adde
GALLO said that the on voter registration groups was Se not recall any details about the contributions. GALLO said he di	nator ALAN CRANSTON solicitations by Cl	, and GALLO could RANSTON for
estigation on _8/30/91at Modesto, C	alifornia File # <u>58</u> 0	C-PX-41605

This document contains neither recommendations nor conclusions of the FBI. It is the property of the FBI and is loaned to your agency; it and its contents are not to be distributed outside your agency.

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Continuation of FD-302 of			, On	8/30/91	, Page	_ 2	

was simply voter registration, and no mention was made how these groups could benefit Democrats or CRANSTON.

GALLO was asked whether during 1986 through 1989, E&J GALLO WINERY had any legislative or regulatory matters pending with the Federal Government. GALLO responded that the wine industry is heavily regulated and that he is constantly on alert for possible tax increases. GALLO said he did not recall ever asking CRANSTON for any assistance in particular during 1986 through 1989, and GALLO could not recall any issue E&J GALLO WINERY had involving CRANSTON's office during 1986 through 1989. GALLO said that during 1986 through 1989, CRANSTON did not do anything to assist GALLO or E&J GALLO WINERY. GALLO added that he is certain that he discussed some issues with CRANSTON. GALLO said he could not recall CRANSTON ever arranging any meetings for E&J GALLO WINERY with regulators or Executive Branch personnel.

GALLO was asked about the \$2 million per grandchild exemption for generation-skipping transfers enacted in late 1986, referred to by some commentators as the "Gallo Exemption." GALLO said CRANSTON had "very little" to do with this legislation and GALLO could not recall discussing the matter with CRANSTON. GALLO said other legislators took charge of the issue, and that ______ law firm in Washington, D.C. was hired to handle the issue. GALLO stated that to his knowledge, _____ firm had no contact with CRANSTON on this issue.

GALLO stated that he never felt that he had to contribute to CRANSTON or to the voter registration groups to obtain access to CRANSTON or to CRANSTON's staff. GALLO said CRANSTON never implied that there was a connection between contributions and services performed by CRANSTON or his staff. GALLO explained that his motivation for contributing \$300,000 to the voter registration groups affiliated with CRANSTON was that voter registration was a cause that GALLO thought was worthy and the contributions were requested by someone he considered to be a friend.

GALLO stated t <u>hat E&J GALLO</u>	
relations employee named	who primarily handles
government relations in Sacramento.	GALLO said he was unfamiliar with

In his dealings with CRANSTON, GALLO stated he never had an occasion to question CRANSTON's ethics. GALLO added that there were no other politicians with whom he felt "uncomfortable" regarding

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FD≃302a (Rev.	11-15-83)

Continuation of FD-302 of	, On	8/30/91	, Page	3
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solicitations for campaign contributions. GALLO added that he felt that there was a "good bunch" of politicians in Washington, D.C.

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FEDERAL BUREAU OF INVESTIGATION

,	Date of transcription 10/8/91
date of birth place of business, The Kaempfer C Suite 1000, Washington, D.C., tel presence of his attorney, the interviewing Special Agents' nature of the interview, information:	<u>aphone</u> in the <u>After being advised</u> of
deeply involved with a non-profit the Committee for a Democratic Co registers all voters, regardless	onsensus (CDC), which he stated
residence to benefit Senator ALAN he hosted a fund raiser in the su his residence, 1406 34th Street, himself paid for the "food, booze does not recall whether that time, but he has done so on	nmmer or early fall of 1986, at N.W., Washington, D.C
previously	said he guessed the rental was
other organizations, either at reincluded MAURICE TURNER's campaid mayor of Washington, D.C. (at hall charter group's 200th anniversary	gn as a Republican to become lf rent), the Williamsburg y of the Constitution (rent- venteen churches, the Cooperative
free), and a program of about set Urban Ministry. He has done this	s for "maybe twenty organizations d that he was not sure, without
free), and a program of about set Urban Ministry. He has done this over the years."	s for "maybe twenty organizations

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Continuation of FD-302 of	b6 b7С
checking his records, to what extent CDC's rent was paid or "forgiven."	
When asked how the CRANSTON fund raiser came about, stated that he did not remember specifically. He "did a lot of Democratic stuff." and knew who probably asked him to do it. had had a joint venture with two guys from California to build three buildings there. He had helped California candidates for Lieutenant Governor and State Treasurer. a California lawyer, was one of KAEMPFER's biggest tenants and investors. was also involved with the fund-raising party. probably held fifteen such fund raisers over the last eight years, including two for Democratic Presidential candidate MICHAEL DUKAKIS.	ь6 ь7С
After consulting with a company employee, stated that, from about 1986 to 1989, CDC's rent was \$500 per month for eight months, and free for one year. (phonetic) actually occupied the space, and she "became like a member of the company family."	b6 b7С
Some Democratic contacts may have asked about holding the fund-raising party, or may have volunteered it. He probably said something to like, "If there's anything I can do to help, I'd be delighted." The logistics were probably arranged by one of secretaries. stated that his housekeeper would have been there, and he would have hired a bartender. He usually used Ridgewell's (caterers) for things like the hors d'oeuvres.	b6 b7С
was asked whether he ever requested any assistance from Senator CRANSTON. stated that in late fall of that year (following the fund raiser), Senator CRANSTON, Senator MOYNIHAN and a Republican Senator were outraged that Arlington buildings known as the "silver slippers" could be seen from Washington. They wanted to enact a law prohibiting buildings taller than a certain height within twenty miles of Washington, so could they could not be seen from the Mall. At the time, there were proposals to construct a complex called Port America and a World Trade Center in the D.C. area. Also, was building a 200 foot building in Arlington, which he had recently gotten approved, and his title attorney mentioned the height restriction issue to him. Someone from office went to see MOYNIHAN, whom did not know, and	b6 b7С

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Continuation of FD-302 of	on 9/4/91,	Page <u>3</u>	b6 – b7C
went to see someone in CRANSTO to get the law written to "ameliorate" building in Arlington. stated building would not be visible from the do a study and show this. They would that the legislation would not unnecess response was that the matter was open that the engineering done and the the billion however, it all became moot because, as (Federal Aviation Administration), Natificate Base and the Airline Pilots Associated the limit was lowered without the legislating and the "issue were	the situation about the description of the Mall, and they offered offer language changes sarily hurt them. The to discussion. It was rewritten. If the far input from the FAR ional Airport, Andrews ciation, the building egislation.	neir d to so	
When asked whether he ever for contribute or raise money to get action "Absolutely not."			ь6 ь7с
	action regarding the]stated, "No one in any t regarding any governy no pressure to contrik r than friendship and	iture Ment	
unusual," and that he has gotten thank things he had done, like the party not aware of any improprieties by CRANS	ed that it "wouldn't be you notes "from ALAN" stated that he STON or anyone on his e a California trip who ost about \$80 per night	e for was en	b6 b7С

TRANSMIT VIA ☐ Teletype ☐ Facsimile ☒ AIRTEL	PRECEDENCE: Immediate Priority Routine	CLASSIFICATION: TOP SECRET SECRET CONFIDENTIAL UNCLAS E F T O UNCLAS
	· · · · · · · · · · · · · · · · · · ·	Date 11/15/91
TO :	SAC, LOS ANGELES (SARA)	
FROM :	SAC, SACRAMENTO (58C-PX-	-41605)(RUC)
SUBJECT :	ALLEGATIONS CONCERNING U.S. SENATORS ALAN CRANS CORRUPTION OF FEDERAL PU LEGISLATIVE; OO: PHOENIX/LOS ANGELES	
	Re Los Angeles airtel to	Sacramento dated 9/16/91.
		s are the original and one erview of ERNST GALLO. No mento Division.
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2 - LA (End 2)- PX 2 - SC TAS:11c (6)	2. 2)	581-PX-41605-98 SEPTEMBER 516 NOV 2 5 1991 .
Approved:	Transmitted	Per

U.S. Department of Justice



Federal Bureau of Investigation

In Reply, Please Refer to File No.

201 East Indianola, Suite 400 Phoenix, Arizona 85012

September 25, 1991

ALLEGATIONS CONCERNING UNITED STATES SENATORS ALAN CRANSTÓN;
AND OTHERS; CHARLES H. KEATING, JR., DBA LINCOLN SAVINGS AND LOAN
ASSOCIATION AND AMERICAN CONTIENTAL CORPORATION;
CORRUPTION OF FEDERAL PUBLIC OFFICIALS - LEGISLATIVE;

On April 15, 1991, a meeting was hell California, in the Office of the United States Assistant United States Attorney (AUSA) Departmental Attorney attended meeting evidence was reviewed and it was deter successful prosecution cannot be accomplished unless an insider was developed.	and and buring this mined that a
Following this meeting, efforts have development of information which could lead to against and	been focused on prosecutable cases
Documents and interviews conducted in for any evidence to determine if was campaign contributions from Capitol Hill. Add Election Commission (FEC) records have been resif any conduit contribution violations could in Political Action Committee (PAC) and Cranston's PAC, the Committee for Democrative of these records have revealed no wide for contributions, although the Pacific PAC and Democratic Consensus contributed \$4,000 to each week period.	actively soliciting ditionally Federal eviewed to determine be developed in the Pacific PAC, cic Consensus. A spread use of PACs and the Committee for
testified before the Committee, that the Cranston's statement submit publication in the Congressional Record in Mar	tted for
4 - Bureau 1 - USA, Central District of California, Los A 1 - USA, Phoenix, Arizona 2)- Phoenix (58C-PX-41605) REB:slj (8)	Indexed

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work product. This statement is believed to be the work product of Washington D.C. lawyer/lobbyist The statement was an effort to counter the Proxmire Amendment to his Federal Savings and Loan Insurance Corporation (FSLIC) Recapitalization Bill that would have clarified FSLIC's authority to regulate direct investment of state chartered institutions. Cranston demanded Proxmire withdraw his amendment, stating on the record that the amendment was unnecessary, because FSLIC already had such authority during an interview with the Federal Bureau of Investigation (FBI) said that he prepared this statement, for which has taken credit.	ъ6 ъ7С
Efforts to develop a perjury case against is difficult because of the Speech and Debate Clause of the Constitution. Efforts to obtain original evidence in this perjury matter have not been successful. attorney and his lawfirm have been contacted in an effort to retrieve his work product. In an effort to obtain his work product, review of documents submitted to the depository in Phoenix by lawfirm failed to locate any records supporting statement that he prepared the Jordan/Cranston statement.	ь6 ъ7С
Attorneys requested that be interviewed. after	
AUSA and Department of Justice (DOJ) Attorney also requested that the FBI obtain information regarding charitable solicitations, made by from Charles Keating. Deconcini's attorney, Was contacted and he provided the FBI with this information. It was determined from that only solicited two contributions from Keating as follows: In 1985, solicited \$50,000 from Keating for contributions to the Phoenix Memorial Hospital Intergenerational Child Care Center, later known as "Young Company". recollection is that she does not know if Keating contributed the full amount. In 1987 or 1988, by telephone solicited Keating for a contribution for the construction of a gymnasium at the Seton Catholic High School in Chandler, Arizona. Keating, however, told that funds were not available.	ъ6 ъ7С
Charities that was involved in from 1975 to 1990 were compared with documents of American Continental Corporation (ACC) and Lincoln Savings and Loan Association (LSL) records of charitable contributions. It was determined that Keating and/or his company contributed \$77,500 to Phoenix Memorial Hospital in 1986 and 1987. In 1985 and 1986, \$20,000 was contributed to St. Mary's High School and/or St. Mary's Church.	

Senator Don Riegle in March, 1987, received \$95,150 raised by a Keating fund raiser in Detroit, of this amount \$78,250 was contributed to Riegle by Keating, Keating's family or employees.

At least \$25,000 of the \$78,250 contributed by Keating, friends and associates were collected by ACC lobbyist and in late February or early March of 1987. This \$25,000 was given to Deconcini for delivery to Riegle by (who has declined to be interviewed by the FBI). Riegle and his aid, met with Keating in early March, prior to the fund raiser in Detroit. Riegle admits he met with Federal Home Lone Bank board, on March 6, 1987, suggesting to that he should meet with Arizona Senators regarding Lincoln Savings and Loan Association. Riegle then attended a follow up meeting with the Federal Home Loan Bank representatives of San Francisco with the other Senators on April 9, 1987.

On February 28, 1988, Keating agreed to sponsor another fund raising event for Riegle to be held in New York, on May 10, or May 11, 1988, with a goal of raising over \$100,000 for Riegle's campaign.

A Detroit newspaper reported that the bulk of the funds raised at the 1987 hotel Pontchartrain event were from Keating, his family and ACC/LSL employees. On February, 1988, Riegle returned the contributions made by Keating and his associates. Riegle testified under oath before the Senate Ethics Committee that he did not know the magnitude of the Keating family and associates contributions, until he read the newspaper article.

In an effort to determine if Riegle perjured himself, leads were sent to interview prepared a memo, dated February 28, 1988, concerning the fund raiser event. where she stated, "We know Keating can produce" the \$100,000. signed the report that the Riegle Committee submitted to the FEC for the first six months of 1987. In this report the contributions raised in connections with the hotel Pontchartrain event in 1987 were listed by contributors name, address and employer. On July 9, 1991, a meeting was held in Los Angeles of the Office of the U.S. Attorney. (AUSA Departmental Attorney attended this meeting). During this meeting investigation requested by them was discussed. It was decided by that before they made a prosecutive decision they would review the evidence

collected thus far. Attorneys

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request any additional investigation regarding Senators McCain,

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did not

Riegle, Deconcini and Glenn. Attorneys requested that the Federal Bureau of Investigation (FBI) interview people who contributed \$25,000 or more to Cranston affiliated "soft money" voter registration groups.

Eight interviews have been conducted, and these individuals, revealed no connection between Cranston's services for contributions to "soft money" groups. Two interviews remain outstanding.

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ALAN CRANSTON, D JOHN GLENN, JOHN CHARLES H. KÉATI LINCOLN SAVINGS	AND LOAN ASSOCIATION SL) AND AMERICAN PORATION (ACC),	GLE ;		
Re I to Cincinnati.	A 8/14/91 facsimile t	to WMFO and LA	8/15/91 te	1
copies of the FD	osed for <u>Los Angeles</u> -302 of ing related interview		al and two and a 1A	
	osed for Phoenix are 302 (for information)		the FD-302	of
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	s matter remains pendi X regarding the likel WMFO.			
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JAN 1 4 1992

FBI — PHOENIX

1.

Memorandum

9/12/84



SAC, LOS ANGELES (58C-PX-41605) Date 11/27/91 (SARA) (P) From: SA Subject: UNITED STATES SENATORS ALAN CRANSTON, DENNIS DE CONCINI, JOHN GLENN, JOHN MC CAIN, DONALD RIEGLE; CHARLES H. KEATING, dba Lincoln Savings and Loan Association, Irvine, California, and American Continental Corporation, Phoenix, Arizona; CORRUPTÍON OF FEDERAL OFFICIALS - LEGISLATIVE; 00: Phoenix 00: Los Angeles The following is an updated chronological list of events in this matter obtained from interviews, newspaper articles, and other investigation to date: 5/1/83 FEDERAL HOME LOAN BANK BOARD (FHLBB) 2/22/84 AMERICAN CONTINENTAL CORPORATION (ACC) buys LINCOLN SAVINGS AND LOAN ASSOCIATION (LINCOLN) for \$51,000,000 6/6/84 KEATING. meet with in Los Angeles 6/7/84 KEATING meets with DE CONCINI 7/11/84 Date of ALAN CRANSTON's letter to which he requests that defer issuance of direct investment limitation. 7/16-19/84 approaches CRANSTON at Democratic Party convention in San Francisco and says LINCOLN wishes to "establish a contact" with CRANSTON and offers to "help" with campaign contributions. 8/26-31/84 JOHN MC CAIN vacation at KEATING's place at Cat Cay, Bahamas

meets with DE CONCINI

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Late 1984	LINCOLN Attorney/lobbyist asks CRANSTON banking aide to oppose direct investment limitations; declines to do so.
9/22/84	KEATING dines with JOHN MC CAIN and in Phoenix
9/26/84	KEATING dines with MC CAIN in Washington
10/15/84	DE CONCINI dines with KEATING in Phoenix
12/7/84	CALIFORNIA DEPARTMENT OF SAVINGS AND LOAN (LARRY TAGGART, Commissioner), approves \$349,000,000 of direct investments by LINCOLN immediately before the 12/10/84 deadline for the investments to qualify as grandfathered investments under new FHLBB regulation
12/10/84	FHLBB re-proposes direct investment regulation (12CFR563.9-8) - would generally limit direct investments to ten percent of assets - contains grandfather clause
12/17/84	KEATING meets separately in Washington with and Senators ALAN CRANSTON, JOHN GLENN, MACK MATTINGLY, PAUL LAXALT, and DENNIS DE CONCINI
12/84-1/85	Congressman CHARLES "CHIP" PASHAYAN lobbies to not adopt direct investment regulation
1/1/85	
1/4/85	of TCS visit KEATING in Phoenix; KEATING offers to buy 20 percent of TCS FINANCIAL; KEATING and solidify \$200,000 consulting contract
1/18/85	LINCOLN invests \$2,900,000 in TCS FINANCIAL for a 22 percent stake sold in private offering - 578,000 shares at \$5.00 per share
1/29/85	KEATING meets separately with Congressman MC CAIN and JACK KEMP, and Senator DE CONCINI
1/31/85	FHLBB adopts the ten percent direct investment rule, which is implemented 3/18/85.

2/1/85	LINCOLN applies to FHLBB for approval to exceed the impending 10 percent limit on direct investments. The application is denied on 5/17/85.
2/13/85	writes the FHLBB of San Francisco on behalf of LINCOLN requesting that LINCOLN be exempted from the ten percent direct investment rule
2/27/85	
2/28/85	KEATING testifies before House Subcommittee
4/2/85	KEATING has dinner with Senator DE CONCINI in Washington. Meets with MC CAIN on next day.
4/8/85	KEATING and associates contribute \$15,000 to Senator PETE WILSON
4/9/85	KEATING and associates contribute \$15,000 to Senator ALAN CRANSTON in connection with LINCOLN fundraiser held in Orange County
4/16/85	CRANSTON meets with
5/27/85	and UNIVERSITY OF ROCHESTER Professor testify, on behalf of LINCOLN, before Government Operations Oversight Subcommittee in opposition to FHLBB's direct investment position.
7/10/85	KEATING, meet separately in Washington with Congressman JOHN MC CAIN, Congressman JIM KOLBE, Senator CRANSTON, and Senator DE CONCINI
7/20/85	White House staffer that White House Chief of Staff DON REGAN said in June personnel meeting that he wanted out soon
7/31-8/15/85	KEATING and associates contribute \$22,000 to Senator GLENN
7/31-8/15/85	KEATING and associates contribute \$16,000 to Senator DENNIS DE CONCINI

8/28/85	ACC contributes \$100,000 to the non-federal account of National Council on Public Policy, a PAC affiliated with Senator JOHN GLENN
8/22-29/85	JOHN MC CAIN and family are guests of KEATING's in Cat Cay, Bahamas
9/15/85	MC CAINs have dinner at KEATING's house in Phoenix
9/30/85	White House staffer relays REGAN's request to resign
10/1/85	Washington Attorney that he had a job offer for had previously been so advised by FHLBB member
10/27/85	KEATING and associates contribute \$8,000 to Senator CRANSTON at fundraiser in Phoenix
11/13/85	KEATING and associates contribute \$8,000 to Congressman JACK KEMP
11/20/85	KEATING, meet separately with of FHLBB in Washington
11/21/85	KEATING meets separately with Congressman DOUG BARNARD, Senator CRANSTON, Congressman MC CAIN, Congressman PASHAYAN, Senator MATTINGLY, Senator PETE WILSON, Congressman CARROLL HUBBARD, Congressman CHALMERS WYLIE, Senator WILLIAM ARMSTRONG. Has dinner with Senators DE CONCINI and GLENN.
11/22/85	meets with KEATING and in Washington regarding job offer for
11/ /85	TAGGART, California Assemblyman PAT NOLAN successfully lobby CALIFORNIA SAVINGS AND LOAN Commissioner WILLIAM CRAWFORD to drop proposed rule that would have limited LINCOLN's investments by requiring 80 percent be mortgage loans
11/26/85	KEATING and contribute \$4,000 to DEMOCRATIC CONGRESSIONAL CAMPAIGN COMMITTEE
11/27/85	NOLAN, TAGGART, lobby CALIFORNIA LEAGUE OF SAVINGS INSTITUTIONS (Chairman-GERALD BARRONE; Director-DEAN

	CANNON), to drop support of CRAWFORD's proposal
12/13/85	KEATING meets with Vice President GEORGE BUSH in Washington
12/ /85	NOLAN reportedly receives \$9,000 campaign contribution from KEATING
12/ /85	At CRANSTON's request, begins to organize America Votes and the fundraising program for nonpartisan voter registration
1/23/86	KEATING attends Governor DEUKMEJIAN campaign luncheon in Los Angeles
2/6/86	KEATING has telephone conference with
2/28/86	ACC contributes an additional \$100,000 to NATIONAL COUNCIL ON PUBLIC POLICY - affiliated with Senator JOHN GLENN - non-federal fund
3/1/86	KEATING and Senator DON RIEGLE meet in Detroit at opening of HOTEL PONTCHARTRAIN. ACC pays travel expenses for RIEGLE and his wife round trip from Washington to Detroit.
3/3/86	KEATING and associates contribute \$12,000 to KOLBE
3/6/86	Eleven ACC officers attend DEUKMEJIAN campaign dinner in Los Angeles
3/12/86	Regularly scheduled FHLBB examination of LINCOLN begins
3/26/86	KEATING, meet separately with Treasury Undersecretary GEORGE GOULD, Congressman JOHN DINGELL, Senator GLENN, Congressman JACK KEMP, Senator DE CONCINI, in Washington
3/17-31/86	KEATING and associates contribute \$54,000 to Senator JOHN MC CAIN
3/31/86	invest \$359,100 in a Phoenix shopping center project developed and managed by ACC.

4/4/86	KEATING and associates contribute \$10,000 to Senator MACK MATTINGLY (Georgia)
4/9/86	KEATING and associates contribute \$5,000 to NATIONAL ACTION COMMITTEE, former Congressman DAVE EVANS' political action committee (PAC)
6/2/86	KEATING and associates contribute \$11,000 to Congressman CHARLES PASHAYAN
6/4/86	announces he will resign from FHLBB
6/6/86	DE CONCINI writes White House Chief of Staff REGAN and recommends for the FHLBB post vacated by
6/24/86	REGAN interviews re FHLBB position travel expenses billed to ACC)
7/2/86	is nominated by the President to the FHLBB. The nomination is later withdrawn.
7/3/86	KEATING meets with San Francisco examiners and reportedly threatens to sue members of FHLBB.
7/7/86	KEATING and meet with Senator PAULA HAWKINS in Phoenix. Senator DE CONCINI has lunch with KEATING at ACC, Phoenix.
7/9/86	KEATING and meet separately in Washington with Treasury Undersecretary GEORGE GOULD and Senator GLENN. Have dinner with to discuss status of FHLBB nominations.
7/15/86	KEATING and meet separately with Congressman JOHN DINGELL,
7/16/86	KEATING and in Washington separately meet Senators HAWKINS, RIEGLE and CRANSTON (with regarding FHLBB regulations and nomination to FHLBB, and with
7/17/86	telephones KEATING in Miami
7/20/86	Congressman DOUG BARNARD has dinner with KEATING, at KEATING's home in Phoenix. receives

	\$19,000 in campaign contributions and ACC pays his travel expenses.
7/23/86	Reconsideration of Judge DANIEL MANION confirmation defeated in Senate on a tie vote. DE CONCINI does not vote (pairs with GOLDWATER), after KEATING lobbies him to support so the White House will support
7/23/86	In memo to KEATING, values interest in CSI at \$1,394,000.
7/25/86	KEATING and associates contribute \$20,000 to Senator PAULA HAWKINS
7/25/86	spends day at ACC in Phoenix - discuss Atlanta properties and possible appointment at FHLBB
7/28/86	KEATING meets with
7/29/86	KEATING meets with Senator HAWKINS in Washington andin Atlanta
7/29/86	CHARLES H. KEATING, et al, meets in D.C.
8/4/86	TAGGART writes White House Chief of Staff DONALD REGAN complaining about and mentioning his adverse effect on Republican fundraising.
8/4-6/86	KEATING and associates contribute \$11,000 to Senator CRANSTON
8/7/86	writes memo valuing his interest in CSI at \$3.3 - \$3.4 million.
8/11/86	KEATING and meet separately with and Congressman BARNARD re nominations, and with
8/12/86	KEATING and meet separately with FHLBB member MC CAIN, PASHAYAN,
8/14/86	PASHAYAN writes requesting information on institutions requesting waiver of 10 percent direct investment limitation. The

letter was signed by 15 other House Republicans.

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8/15/86	Phoenix re Continental Southern conflict problem for
8/16/86	FHLBB member leaves the Board
8/14-17/86	KEATING and associates contribute an additional \$13,000 to Congressman PASHAYAN for a total of \$24,000
8/19/86	KEATING meets with Atlanta in
8/20/86	KEATING and associates contribute \$10,000 to Senator DE CONCINI.
8/22/86	KEATING and associates contribute \$4,000 to HARRY REID
8/23-29/86	MC CAIN family travels from Phoenix to Miami on ACC airplane to spend week in Cat Cay
8/22-9/4/86	KEATING and associates contribute \$21,150 to Congressman RHODES
9/10/86	meet separately with CRANSTON, MC CAIN, and RIEGLE regarding FHLBB matters and nominations. KEATING and Senator HAWKINS meet with DON REGAN at White House regarding same.
9/ /86	FHLBB member quits Board effective 10/17/86
9/16/86	meets with DE CONCINI
9/20/86	"Washington Post" writes that LINCOLN officials claim FHLBB harassment. asks FHLBB of San Francisco to explain - San Francisco blames LINCOLN for delays in examination
Fall 1986	ACC contributes \$100,000 to the Florida Republican Party for the benefit of
10/7/86	is nominated to the FHLBB by the President. Senate adjourns 10/18 without considering nomination.

10/8/86	ACC contributes \$35,000 to the California Democratic Party, primarily for CRANSTON's benefit
10/13/86	KEATING and have telephone conversation
10/14/86	ACC contributes an additional \$50,000 to the California Democratic Party, primarily for CRANSTON's benefit
10/17/86	KEATING and have telephone conversation
10/18/86	On last day of the Senate's 1986 session, Senator PROXMIRE introduces a FSLIC recapitalization bill with no direct investment limitation. CRANSTON and GLENN had interceded with PROXMIRE on behalf of LINCOLN to delete the direct investment limitation.
10/21/86	CRANSTON's Senate campaign borrows \$350,000 from Deauville Savings and Loan, on line of credit arranged on 10/6/86
10/23/86	CRANSTON's Los Altos commercial property is appraised at the request of LINCOLN in connection with loan application of CRANSTON's campaign to LINCOLN. A \$300,000 unsecured line of credit was extended by LINCOLN to CRANSTON, but the line of credit was never drawn on, because it was not needed.
10/31/86	FHLBB exam of LINCOLN that began 3/12/86 is completed. Closing meeting with LINCOLN official held on 11/7/86
11/4/86	KEATING and attend DEUKMEJIAN and CRANSTON victory celebrations in Los Angeles
11/7/86	HENKEL receives recess appointment to FHLBB.
11/11/86	Atlanta attorney a friend of KEATING and borrower from and attorney for LINCOLN, is sworn in as a member of the FHLBB
11/25/86	interest in CONTINENTAL SOUTHERN is purchased by an ACC subsidiary for \$3,700,000, following meeting of KEATING,

	at Indian Creek
10/5/06 3	
12/5/86 and 12/16/86	KEATING meets in San Francisco with FHLBB-SF regulator regarding LINCOLN exam
12/13/86	LINCOLN attorney/lobbyist meets at River Inn in Washington and lobbies re direct investment rule and grandfathering
12/18/86	proposes at FHLBB meeting a rule change that would protect LINCOLN from enforcement of the direct investment rule. proposal died for lack of a second. Before the meeting, asks for to review and type the proposal. qets suggested changes from and
12/19/86	FHLBB authorizes 407(m) fraud investigation of LINCOLN regarding file-stuffing and back-dating
1/2/87	sends CRANSTON a short list of individuals (including KEATING) who have been "very helpful" to CRANSTON and who "rightly expect" a resolution of their pending cases or legislative matters.
1/8/87	meets with DE CONCINI, (may have canceled)
1/9/87	meet with CRANSTON
1/16/87	meets with KEATING, in Phoenix
1/26/87	KEATING and meet with Congressman BARNARD in Washington
1/27/87	A second closing meeting is held, at KEATING's request, between LINCOLN and FHLBB officials. KEATING and meet in Congressman CARROLL HUBBARD's office, and separately meet with Senators DE CONCINI and PHIL GRAMM in Washington
1/28/87	KEATING and have separate meetings with MC CAIN, CRANSTON (with GLENN, PASHAYAN, DE CONCINI, and RIEGLE in

	Washington, at meeting with RIEGLE, KEATING offers to organize a fundraising event for RIEGLE.
1/29/87	KEATING meets with Senator HAWKINS at her home in Orlando regarding replacement
2/5/87	MC CAIN meets with RIEGLE
2/13/87	Recess appointee are renominated by White House
2/13-3/18/87	KEATING and associates contribute \$11,000 to Senator TIM WIRTH
2/18/87	KEATING meets withat FHLBB in Washington. KEATING andmeet separately with Senators ARMSTRONG, MC CAIN, and TERRY SANFORD and Representative JIM WRIGHT
12/19/87	ACC wires \$3.7 million to blind trust via Troutman, Sanders. requests \$250,000 distribution from trust.
2/26/87	Senator RIEGLE meets with and to discuss LINCOLN's dispute with regulators
2/27/87	CRANSTON meets with possibly
2/27/87	FHLBB abstaining) adopts "equity risk investment rule" to be effective 4/15/87; shortly thereafter, LINCOLN sues to block the rule as unconstitutional
3/3/87	DE CONCINI has lunch with
3/3/87	KEATING and contribute \$4,000 to PAC
3/3/87	LINCOLN contributes \$100,000 to AMERICA VOTES, later known as USA VOTES. Contribution was solicited by CRANSTON
3/6/87	Senator RIEGLE meets with says Arizona senators are quite concerned with FHLBB regulation of LINCOLN and suggests that meet with them

3/8/87	RIEGLE and top aide visit KEATING in Phoenix and after a helicopter tour, RIEGLE reportedly states, "I like what I see here. I can reason with
3/9/87	RIEGLE, fly commercial airlines together to Washington
3/13/87	(later of ACC) writes letter to senators critical of regulators
3/16/87	RIEGLE meets with CRANSTON, and later with
3/17/87	RIEGLE meets with
3/18/87	LINCOLN sues FHLBB, challenging the direct investment limitations. DE CONCINI meets with RIEGLE re ACC, RIEGLE suggests having a meeting with
3/19/87	Senators DE CONCINI's staffer, writes confidential memo to DE CONCINI summarizing what ACC "wants from and what ACC is "willing to do". DE CONCINI meets with MC CAIN and proposes that they meet with regarding LSL
3/20/87	LINCOLN files a petition to recuse from decisions regarding LINCOLN
3/23/87	KEATING raises \$95,150 for at luncheon fundraiser held at the Hotel Ponchartrain. Of the \$95,150, \$78,250 was given by persons connected to ACC.
3/24/87	Senator JOHN MC CAIN meets with KEATING and KEATING asks for MC CAIN's negotiating assistance. MC CAIN declines and six-year friendship ends. KEATING and meet separately with Senators DE CONCINI, CRANSTON (with and ROBERT DOLE
3/25/87	Senator PROXMIRE offers amendment to FSLIC recap bill (SB790) that would authorize FSLIC to define unsafe and unsound practices, which would moot LINCOLN's lawsuit against FHLBB.
3/26/87	CRANSTON convinces PROXMIRE to withdraw his amendment - at request of LSL. meets with CRANSTON.

3/27/87	CRANSTON's aide submits to Congressional Record language written by ACC's attorney that would assist LSL in litigation against FHLBB
4/1/87	resigns from FHLBB
4/2/87	meets with Senators DE CONCINI, MC CAIN, CRANSTON and GLENN in DE CONCINI's office regarding LINCOLN
4/9/87	and three other FHLBB regulators meet in DE CONCINI's office with DE CONCINI, MC CAIN, CRANSTON, GLENN and RIEGLE - DE CONCINI tries to make deal for LINCOLN - offers that LINCOLN will invest 55 percent of assets in home mortgage if FHLBB yields on direct investment rule and property appraisals. Before this meeting, meets with DE CONCINI
4/13/87	CRANSTON's aide, visits ACC in Phoenix at ACC's expense
4/19/87	RIEGLE supports to be at request of ATHC.
4/20/87	FHLBB Report of Examination sent to LINCOLN
4/21/87	RIEGLE meets with
5/1/87	FHLBB of SAN FRANCISCO recommends to FHLBB that LINCOLN be seized. This recommendation is the conclusion of a 285-page Recommendation and Statement of Supervisory Concerns
6/2/87	Date of CRANSTON's letter to KEATING thanking him for 1986 contribution to California Democratic Party's GOTV
6/24/87	requests CRANSTON's help at the conference committee for the Competitive Equity Banking Act (CEBA)
6/30/87	leaves FHLBB post; replaced by
7/10/87	CENTER FOR PARTICIPATION IN DEMOCRACY and THE ORGANIZING INSTITUTE (originally known as MONTEREY LEADERSHIP TRAINING INSTITUTE) are

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	incorporated -
7/10/87	asks Senator PROXMIRE's aide for his files on KEATING
7/17/87	LINCOLN sues FHLBB over leaks of information regarding LINCOLN examination; lawsuit is dropped on 7/29/87, after assurance received from
7/23/87	of FHLBB's Office of Regulatory Policy, Oversight and Supervision (ORPOS) recommends LINCOLN be placed in receivership and that FHLBB be briefed on all supervisory options
7/23/87	meets with FHLBB's and to resolve LINCOLN's lawsuit alleging leaks
8/4/87	On behalf of LINCOLN, provides CRANSTON/PROXMIRE colloquy for Congressional Record re Competitive Equity Banking Act.
	3
8/7/87	joins the FHLBB
8/7/87 8/21/87	
	joins the FHLBB LINCOLN contributes \$10,000 to the GARN
8/21/87	joins the FHLBB LINCOLN contributes \$10,000 to the GARN INSTITUTE LINCOLN informed of proposed field visit by FHLBB OF SAN FRANCISCO examiners in connection with re-examination based on LINCOLN's claim of new facts. LINCOLN responds that no further information would be
8/21/87 8/28/87	joins the FHLBB LINCOLN contributes \$10,000 to the GARN INSTITUTE LINCOLN informed of proposed field visit by FHLBB OF SAN FRANCISCO examiners in connection with re-examination based on LINCOLN's claim of new facts. LINCOLN responds that no further information would be given without a court order
8/21/87 8/28/87 9/2/87	Joins the FHLBB LINCOLN contributes \$10,000 to the GARN INSTITUTE LINCOLN informed of proposed field visit by FHLBB OF SAN FRANCISCO examiners in connection with re-examination based on LINCOLN's claim of new facts. LINCOLN responds that no further information would be given without a court order CPD obtains 501 (c) (3) status from IRS Following a meeting of and FHLBB General Counsel the FHLB OF SAN FRANCISCO was ordered not to conduct further examinations of LINCOLN - and LINCOLN was

9/24/87	KEATING. meet with
,,	regarding 1986 FHLB OF SAN FRANCISCO examination and it
	is decided FHLBB will take an independent
	review of San Francisco findings. KEATING,
	meet separately with Senators DE CONCINI and RIEGLE, Congressman
	RHODES and
	KEATING meets with CRANSTON and in Washington; KEATING
	agrees to contribute \$250,000 to USA VOTES
	and FORUM INSTITUTE after CRANSTON asks for it
10/16/87	FHLBB's
,	completes review of San Francisco
	exam of LINCOLN, concludes that LINCOLN is being operated in an "unsafe and unsound
	manner", and recommends FHLBB proceed with a
	cease and desist order
10/21/87	meets with suggests transfer out of SF District
10/29/87	KEATING and associates contribute \$5,500 to
	DE CONCINI - brings total contribution to \$39,000
	<i>439</i> ,000
11/5/87	LINCOLN sends FHLBB a proposed memo of understanding to resolve issues of exam -
	includes transfer out of San Francisco
	district
11/6/87	delivers to CRANSTON ACC checks dated
, ,	11/5/87 for \$225,000 to the FORUM INSTITUTE,
	and \$25,000 to USA VOTES, an association chaired by CRANSTON and managed by NEW
	DIMENSION RESOURCES
11/12/87	CRANSTON calls to urge quick resolution
11/12/07	of LINCOLN exam
11/13/87	At request, CRANSTON writes Senator
	BENSTON proposing an amendment of the
Internal	Revenue Code's qualified thrift lender test, RIEGLE also assists LINCOLN in this matter.
11/18/87	RIEGLE meets with
11/23/87	receive
	helicopter tour of ACC's Phoenix developments

1/4/88	submits proposed MOU to FHLB-SF; rejected by
1/7/88	KEATING and dine with and aide to Senator JOHN HEINZ, in Phoenix
1/8/88	ALAN CRANSTON have dinner with KEATING and in Beverly Hills
1/18/88	ACC contributes \$6,000 to California Assemblyman TOM BANE
1/18/88	In a memo to CRANSTON, USA VOTES fundraiser reports that KEATING has asked CRANSTON to arrange a meeting with so KEATING can hear from why the LINCOLN SAVINGS exam is continuing four months after told him it would end in two weeks
1/20/88	CRANSTON calls tells of allegation re examiner tasked to find something on LINCOLN. Also tells KEATING will be in town on 1/28.
1/27/88	KEATING and meet separately with Congressman BARNARD and Senator METZENBAUM
1/28/88	meets with KEATING regarding KEATING's complaints of news leaks and length of exam. This meeting may have been arranged by CRANSTON. On the same day, KEATING and meet separately with RIEGLE. DE CONCINI, GLENN and CRANSTON (with
2/2/88	KEATING and associates contribute \$4,000 to
2/4/88	request, FHLBB meets with KEATING for four hours, after told to try to achieve a "peaceful resolution". Separately, KEATING and meet with RIEGLE.
2/5/88	KEATING and negotiate a proposed memo of understanding with
2/9/88	KEATING meets in Sacramento with JOHN GEOGHEGAN, California Secretary of Business, Transportation and Housing

2/10/88	CRANSTON visit KEATING in Phoenix at expense of NEW DIMENSION RESOURCES, and pick up \$400,000 ACC contribution to the CENTER FOR PARTICIPATION IN DEMOCRACY and an additional \$100,000 ACC contribution to the FORUM INSTITUTE
2/12/88	KEATING writes that he is in "full agreement" with a proposed Memorandum of Understanding that would transfer supervision of LINCOLN to FHLB-Seattle
2/16/88	CRANSTON has conversation with
2/19/88	meet with regulators from FHLBB of Seattle regarding potential acquisition by LINCOLN of savings and loan in 12th district
2/22/88	FHLB-SF again recommends conservatorship for LINCOLN to FHLB's Enforcement Review Committee; condemns ORPOS' proposed Memorandum of Understanding
2/23/88	CRANSTON provides KEATING with a letter of introduction to the American Ambassador to Yugoslavia
3/4/88	CPD receives determination from IRS that foundations may contribute without adverse tax consequences
3/11/88	Senator RIEGLE returns contributions made by KEATING and associates totalling \$76,100
3/11/88	KEATING contributes \$10,000 to former Congressman DAVE EVANS' PAC (NATIONAL ACTION COMMITTEE)
3/25/88	KEATING, appear before FHLBB's ERC
4/6/88	KEATING and associates contribute \$11,500 to Senator ORRIN HATCH at Crescent Hotel fundraiser/reception
4/18/88	CRANSTON talks with re ERC hearing
4/20/88	RIEGLE meets with
4/21/88	CRANSTON talks with re ERC status

SAT 4/30/88	FHLBB's Enforcement Review Committee recommends to FHLBB that a new exam of LINCOLN be conducted
5/3/88	KEATING meets with in Sacramento
TH 5/5/88	vote to transfer regulation of LINCOLN from San Francisco to Washington and to negotiate a settlement with LINCOLN; dissents
5/5/88	informs KEATING that Board voted to have supervisory agreement and to put monitor in LINCOLN. KEATING says this was totally unacceptable, and calls CRANSTON and DE CONCINI, asking them to call
5/6/88	CRANSTON's aide calls WALL's aides - tells them that CRANSTON is "very concerned" about "supervisory approach" towards LINCOLN
5/9/88	ACC contributes \$19,000 to California Legislator PAT NOLAN in connection with SAMUELIAN fundraiser
TU 5/10/88	telephones KEATING to tell him to take or leave FHLBB's proposed agreement. KEATING attorney writes KEATING "you have the board right where you want them".
5/16/88	meets with CRANSTON
5/18/88	meets with RIEGLE
5/19/88	CRANSTON and meet with
5/20/88	FHLBB and LINCOLN sign memo of understanding, providing for a new examination to be conducted by ORPOS in Washington
6/5/88	KEATING and associates contribute \$100,000 to REPUBLICAN NATIONAL COMMITTED and attend dinner with Vice President GEORGE BUSH in Los Angeles
6/8/88	
7/11/88	ORA (formerly ORPOS) begins exam of LINCOLN

8/1/88	RIEGLE meets with
10/7/88	visits
10/18-24/88	KEATING and associates contribute \$41,000 to Senator CHIC HECHT
10/24/88	ACC contributes \$5,000 to California Republican Party in connection with a Bob Hope Reception held on 10/27/88
10/31/88	ACC contributes \$75,000 to California Republican Party's victor '88 fund - raised by SAMUELIAN
11/10/88	meets with
11/17/88	KEATING and meet with Senator RIEGLE in Washington
12/2/88	KEATING tells ORA examinerthat four entities are interested in acquiring LINCOLN
12/7/88	CRANSTON and meet with
12/8/88	RIEGLE and meet with and
12/14/88	KEATING, meet with Congressman JON KYL in Phoenix. Later, KEATING and fly to Los Angeles for dinner meeting with Senator CRANSTON and his aide, - CRANSTON greets KEATING by saying this is a meeting of the mutual aid society.
12/20/88	ACC agrees to sell LINCOLN to LINCOLN ACQUISITION CORPORATION, represented by lobbyist and former FHLBB member
1/10/89	ACC contributes \$10,000 to CRANSTON'S PAC, Committee for Democratic Consensus, in connection with Super Bowl party
1/17/89	KEATING and visit to deliver response to exam report. Later, KEATING and meet with CRANSTON, meets with RIEGLE
2/7/89	CRANSTON meets with KEATING in office. Later KEATING,

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	CRANSTON, meet in DE CONCINI's office.
2/8/89	CRANSTON's aide, telephones demanding to know why LINCOLN sale had not yet been approved. CRANSTON calls re pending sale
2/14/89	FHLBB begins third examination of LINCOLN
2/23/89	RIEGLE and meet with
3/27/89	CRANSTON meets with
4/7/89	At the end of the meeting with on another matter, DE CONCINI raises issue of pending offer to sell LINCOLN. meets with CRANSTON and
4/11/89	At KEATING's request, DE CONCINI telephones asks him to support the sale of LINCOLN to ROUSSELOT. CRANSTON's staffer, reportedly calls California officials in support of the sale
4/12/89	CRANSTON urges and FHLBB member to reconsider sale of LINCOLN to ROUSSELOT
4/13/89	CRANSTON urges FHLBB member to hear ROUSSELOT's offer and consider the effect of bankruptcy on California, Arizona, and the FSLIC.
4/14/89	FHLBB seizes LINCOLN - placed in conservatorship. CRANSTON telephones - says Board made a serious mistake. Congressman HUBBARD and KEVIN GOTTLIEB also call re LINCOLN.
6/22/89	meets with
7/13/89	meets with
8/3/89	LINCOLN put in receivership
9/18/89	Senator DE CONCINI says he will return \$48,000 in campaign contributions made by

11/8/89	Congressman PASHAYAN says he will return \$26,000 in campaign contributions made by KEATING and associates
12/4/89	announces his resignation
12/21/89	Senator WILSON announces he has returned \$17,500 in campaign contributions received from KEATING and his associates in one package on 4/8/85

Memorandum



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Subject:

ALLEGATIONS CONCERNING

UNITED STATES SENATORS; ETAL

CHARLES H. KEATING;

CORRUPT PUBLIC OFFICIAL; OO:PX

Today, while checking Closed Files for Sub A of 58C-PX-41605, I found two wallet type envelopes for this file marked 1B(6) and 1B(9). I called ECT who took custody of these envelopes.

58C-PX-4/1605-103

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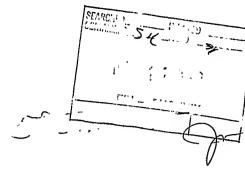
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1-PX 58C-PX-41605 JMS/jms /

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		cover to Phoenix Division n sent to Santa Ana on
Ite	ems of evidence are ma	rked as follows:
	(25), (27), (34), (44 L), (59), item R-1, R-), (45), (46), (47), (50), 2, R-4,
1b	(62) item 1, 3, 4,	
1b	(65) item 6, 9, 14.	
(3) - Phoenix (1 - package (1 - ATTN: F 2 - Los Angele GKM/klz (5)	Evidence Control Techn	586-PX-41605-104
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COVERSHEET FBI FACSIMILE LOS ANGELES DIVISION SANTA ANA PA

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ATTN:						
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SUBJECT:	SUBJECT: 58C-PX-41605					
SPECIAL HANDLING INSTRUCTIONS: PLEASE HAND CARRY TO						
ORIGINATOR'S NAME:						
ORIGINATOR'S FACIMILE NUMBER: (714) 542-863						
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PD-36 (Rev. 8-29-85)

FBI

TRANSMIT VIA: Teletype Facsimile AIRTEL	PRECEDENCE: Immediate Priority Routine	CLASSIFICATION: TOP SECRET SECRET CONFIDENTIAL UNCLAS E F T O UNCLAS
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CITE: //3410:0670//		
PASS: PUBLIC CORRUPTIO	ON UNIT, SSA	
SUBJECT: ALLEGATIONS O	CONCERNING US SENAT	ORS ALAN CRANSTON,
DENNIS DEACONCINI, JOHN	N GLENN, JOHN MCCAI	N, DONALD RIEGLE;
CHARLES H KEATING, JR,	DBA LINCOLN SAVING	s and loan
ASSOCIATION, IRVINE, CA	ALIFORNIA; AMERICAN	CONTINENTAL
CORPORATION, PHOENIX, A	ARIZONA; CORRUPTION	OF FEDERAL PUBLIC
OFFICIALS - LEGISLATIVE	; oo: PHOENIX/LOS	ANGELES.
FOR INFORMATION OF	THE BUREAU INVEST	IGATION OF THIS
MATTER HAS BASICALLY CO	NCLUDED BY THE LOS	ANGELES DIVISION AND
THE PHOENIX DIVISION.	RESULTS OF THE INV	ESTIGATION FOR THE
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GKM/KLZ Approved:	Original filanama	K17.002111. 038
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PAGE 2 58C-PX-41605/UNCLAS/

PAST TWO YEARS HAS CONSISTENTLY BEEN SHARED WITH ASSISTANT

UNITED STATES ATTORNEY FROM THE LOS ANGELES

UNITED STATES ATTORNEY'S OFFICE AND

ATTORNEY WITH THE PUBLIC INTEGRITY SECTION, DEPARTMENT OF

JUSTICE, WASHINGTON D.C.

FOR THE PAST SIX TO EIGHT MONTHS THE INVESTIGATION HAS FOCUSED PRIMARILY ON THE ACTIVITIES OF UNITED STATES SENATOR ALAN CRANSTON (D) (CALIFORNIA) AND HIS RELATIONSHIP WITH CHARLES KEATING AND HIS ASSOCIATES.

THE RESULTS OBTAINED FROM THE FBI INVESTIGATION WERE VERY SIMILAR, IF NOT IDENTICAL, TO THE RESULTS OF THE UNITED STATES SENATE ETHICS COMMITTEE INVESTIGATION CONCERNING THE FIVE SENATORS.

THE FBI INVESTIGATION SHOWED SENATOR ALAN CRANSTON

RECEIVED APPROXIMATELY \$800,000.00 EITHER DIRECTLY, AS

CAMPAIGN CONTRIBUTIONS, OR INDIRECTLY TO CRANSTON SPONSORED

PROJECTS. IN ADDITION IT APPEARS HE MAY HAVE PERFORMED UP TO

15 DIFFERENT ACTIVITIES WHICH WERE CONSIDERED OFFICIAL ACTS.

TO DATE NO AGREED UPON QUID PRO QUO HAS BEEN ESTABLISHED.

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^PAGE 3 58C-PX-41605/UNCLAS/

ON 2/3/82, ASSISTANT UNITED STATES ATTORNEY

ADVISED HE WOULD DECLINE PROSECUTION IN THIS MATTER

DUE TO THE FACT INSUFFICIENT EVIDENCE EXISTS TO SHOW AN AGREED

UPON QUID PRO QUO WHICH IS REQUIRED FOR A HOBBS ACT VIOLATION.

LOS ANGELES DIVISION WILL IN THE NEAR FUTURE SUBMIT AND FD-761

AND ENCLOSED LETTERHEAD MEMORANDUM SETTING OUT A MORE DETAILED

SUMMARY OF THE INVESTIGATION AND RESULTS.

BT

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